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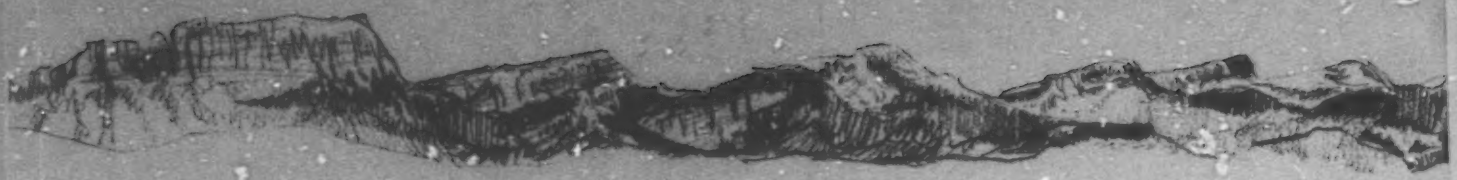

Rocky Mountain Front
Outstanding Natural Area
Activity Plan/Environmental Assessment

FINAL

March 1989

U.S. Department of the Interior
Bureau of Land Management
Lewistown District Office/Great Falls Resource Area

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READEX FICHE best copy available

BLM-MT-ES-89-002-4333

As the Nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering the wisest use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historical places, and providing for the enjoyment of life through outdoor recreation. The Department assesses our energy and mineral resources and works to assure that their development is in the best interests of all our people. The Department also has a major responsibility for American Indian reservation communities and for people who live in Island Territories under U.S. administration.

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

TAKE PRIDE IN AMERICA

1791

Dear Reader:

Thank you for your concerned and helpful responses to the draft Outstanding Natural Area Activity Plan and Environmental Assessment.

The enclosed material constitutes the final document and includes: the final ONA Activity Plan, the Record of Decision, comment letters from the public concerning the draft, and the BLM responses to those public comments.

Portions of this final activity plan have been revised in response to the public comments received. For the reader's convenience, these revised portions have been [redacted] Also, you may notice a break in the numerical sequence of the tables in this final document. This is because most of the tables in this final were pulled forward from the draft, but maintained their original numbers. This should be more convenient for those readers comparing the final to the draft.

You're encouraged to refer to the draft ONA Activity Plan and EA for comparison purposes and additional information about the No Action Alternative.

Requests for copies of these documents and questions about them should be sent to: Bureau of Land Management, ATTN: Doug Burger, Area Manager, Great Falls RA, P.O. Box 2865, Great Falls, MT, 59403.

Sincerely,

Douglas J. Burger

Enclosure

Douglas J. Burger

RECORD OF DECISION

Environmental Assessment and Finding of No Significant Impact

ROCKY MOUNTAIN FRONT OUTSTANDING NATURAL AREAS

ENVIRONMENTAL ASSESSMENT

DECISION NOTICE

It is my decision to adopt the Preferred Alternative detailed in the draft Rocky Mountain Front Outstanding Natural Areas Environmental Assessment, July 1988, which will implement the Coordinated ONA Activity Plan as the management process for the Rocky Mountain Front Outstanding Natural Areas.

A SUMMARY OF THE PREFERRED ALTERNATIVE (COORDINATED ACTIVITY PLAN)

A Coordinated Activity Plan (AP) and the corresponding Environmental Assessment (EA) were prepared for the four Outstanding Natural Areas (ONAs) (Blind Horse, Ear Mountain, Chute Mountain, Deep Creek-Battle Creek) totaling 13,087 acres located on the Rocky Mountain Front, about 20 miles west of Choteau, Montana.

The Headwaters Resource Management Plan/Environmental Impact Statement 1984 (HRMP) established broad management direction for these ONAs to "protect the wildlife habitat, scenery and other surface resources from disturbance" and "to ensure they are managed essentially as wilderness." The purpose of this AP is to provide specific objectives, constraints, and management policy for all current and proposed actions on the ONAs.

Two alternatives were analyzed in the draft EA, the Preferred and No Action. The Preferred Alternative would implement the Outstanding Natural Area guidance, and the No Action Alternative would not change the current administration.

The Preferred Alternative does not amend the HRMP. The AP will be periodically modified within the National Environmental Policy Act and BLM administrative processes, as significant needs arise.

These six major problems or issues were identified by the BLM interdisciplinary team and the public; legal access, seismic activities, resource developments, overnight camping, noxious plants, and fire management and use. This AP addresses these issues.

A substantial number of agency resource use objectives and constraints (such as the Endangered Species Act, related wildlife recovery plans, and specific direction from policy, law, and natural circumstances) were identified in the HRMP. These have also been addressed and incorporated in this AP. The subject area can be described as one of massive limestone cliffs and geologic features that rise to 7,700 feet from 5,000-foot plains. The ONAs are blanketed with conifers, softwoods, shrubs and grasses. The highly dissected topography supports numercus wildlife, and has a very high, nearly pristine wilderness quality. Prominent geographic features include Blind Horse Creek, Deep Creek, Battle Creek, Ear Mountain, and Timber Gulch.

The principle wildlife objectives (to improve riparian communities, fescue grassland benches, grizzly bear and gray wolf habitat, and similar environs important as wildlife habitats) will be achieved through livestock grazing regulation. Public access will be acquired to three ONAs (Blind Horse, Chute Mountain and Deep Creek-Battle Creek) to permit wildlife resources use through hunting, fishing, photography and viewing. Such access currently exists only to the Ear Mountain ONA.

The Rocky Mountain Front (RMF) Wildlife Guidelines will be strictly adhered to if oil and gas seismic activities are proposed. Administrative vehicle access will be permitted only within a strict permit regulation process for limited activities including potential livestock operations, seismic activity, and wildlife management.

Camping will be allowed throughout the year and monitored to determine any detrimental effects on spring grizzly bear use or winter ungulate use relative to the gray wolf. Camping policy changes will be made in response to monitoring results designed to protect the wildlife resources.

Specific guidelines and restrictions will be applied to all ONAs to implement the off-road vehicle (ORV) designations and closures throughout all ONAs. No cross-country travel will be permitted except in an extreme situation, such as grizzly bear control actions, livestock veterinary care, search and rescue efforts, or other similar situations. Camping will be permitted throughout all ONAs except at the Ear Mountain trailhead. The exclusion of camping is necessary at this trailhead because it lies in a grizzly bear high use area, and would create human and bear conflicts. All ONA boundaries will be signed to identify avoidance areas, ORV regulations, noxious plant control efforts and other essential information. Trailheads will be developed as ONA access is acquired, with various degrees of public facilities at each. Camping will be precluded within 200 feet of all springs or similar water sources.

Livestock regulation will be intensified to improve general vegetation communities; to enhance grizzly bear and gray wolf prey populations; and to improve general wildlife habitats. Livestock forage will be evaluated and monitored. The AP will focus on livestock range resource management. Season-of-use restrictions, herding or (as a last alternative) fencing, to exclude livestock grazing, will be implemented where livestock pasture management is not practical.

Integrated pest management methods will be used to control noxious plants, with an emphasis on biological control agents (sheep or goats will not be used).

There will be no broad cultural resources inventory on the ONAs, but site specific evaluations will be required for all proposed actions in the ONAs to assure resource data integrity. Avoidance or mitigation of located cultural resources will be the required procedure.

Air quality in the ONAs is currently Class II and the BLM is obligated by law to maintain that condition. Oil and gas activities, prescribed burning, and other pollutant generating, federally sanctioned actions will meet all air quality standards. Oil and gas exploration and development will be managed in accordance with the HRMP. Existing oil and gas leases in areas designated by the HRMP as future "No Lease" portions of the ONAs will not be reoffered upon lease expiration.

All oil-gas leases will be reviewed to determine if they meet the RMF Wildlife Guidelines. The ONAs will remain open to locatable mineral entry and development as described in the HRMP. No removal of common saleable minerals (gravel, sand and rock) will be permitted.

Water quality will be maintained or improved to meet wildlife, fisheries, and public water quality needs. BLM will file on all water rights within the ONAs. All vegetative increases will be dedicated to wildlife and watershed resources. Oil-gas activities must meet all federal water quality standards.

Wildfire, prescribed burning, and fuel management will be directed to maintain or improve the visual resources, wildlife habitat, watersheds, and public uses of these ONAs.

OUTSTANDING NATURAL AREA ACTIVITY PLAN
(POLICY STATEMENTS AND MANAGEMENT DIRECTION)

A. Wildlife and Fisheries

1. Grazing systems will be actively and intensively managed, particularly in the two East Front allotments, to improve important wildlife habitats. The grazing management program for each allotment as described in the range-livestock section of this AP will be adhered to. If a substantial improvement in vegetation trend is not apparent within two grazing cycles after allotment management plan (AMP) implementation, grazing system modifications will be made to improve important wildlife habitats. This could require excluding cattle from important wildlife habitats, riparian areas important to fisheries and grizzly bears, and fescue/grassland benches important as bighorn sheep winter range. This modification could be accomplished by fence exclosures of the entire area or by fencing out water sources which attract cattle to these important wildlife and fisheries habitats.
2. Intensive grazing management will continue in the Chicken Coulee allotment.
3. Access to the eastern boundaries of three ONAs (Blind Horse, Chute Mountain and Deep Creek-Battle Creek) will be established to allow walk-in hunting, proper wildlife management (regulated harvest), and the general public to use the wildlife resources. Such access currently exists only to the Ear Mountain ONA.
4. Seismic exploration will be allowed in ONAs with strict adherence to the RMF Wildlife Guidelines. Particular care will be exercised by BLM concerning the use and authorization of helicopters (e.g. flight paths, above ground heights, and nine-mile spacing).

B. Recreation

1. Overnight camping will be permitted on BLM-administered land within the ONAs, except at the Ear Mountain trailhead.
2. Camping restrictions at future trailhead developments will be determined on an individual basis.
3. Visitors will be advised to follow correct bear management practices when camping or hiking in the ONAs.
4. All access points will be posted with Montana Department of Fish, Wildlife, and Parks bear management informational signs.
5. Off-road vehicle use in the ONAs will comply with stipulations listed in the Administrative Access section of this AP.
6. ORV barriers will be installed at all ONA boundaries to exclude motorized vehicles from existing roads, vehicle ways, and trails except as specifically authorized by Administrative Access.
7. Non-motorized travel on trails may be restricted during wet periods to avoid damage to wet soils.
8. Authorized vehicle travel will be restricted to designated roads and trails except for those situations discussed under the Range and Administrative Access sections of this document.
9. Visual resource management (VRM) contrast ratings will be completed for all proposed projects in the ONAs.
10. Recreational camping will be restricted within 200 feet of all springs to protect the water source and to permit wildlife use.

C. Range-Livestock

1. This AP limits the livestock class to cattle and horses. Grazing sheep and/or goats will not be allowed in the ONAs because of grizzly bear habitat requirements and potential depredation conflicts. The livestock class policy will follow the wildlife management direction recommended by the interagency grizzly bear committee guidelines, the grizzly bear recovery plan, and the Rocky Mountain Front Guidelines.
2. Administrative use and livestock operators will be allowed to monitor rangeland, inspect livestock and to provide maintenance of range improvements or to, construct range improvements. Every attempt will be made to limit administrative access where practical, to designated roads and trails. In all cases, administrative access will be by permit.
3. No grazing will begin before July 1, and will not extend beyond October 10.
4. Livestock grazing developments will not conflict with wildlife habitat objectives or impair the natural area visual character, and will be designed to improve resource objectives.

5. Integrated pest management will be used to control noxious plants with an emphasis on biological control agents such as insects. No sheep or goats will be used as biological control agents because of grizzly bear conflicts.

6. Moderate livestock grazing use (up to 60%) of suitable rangeland will be allowed. Pasture rotation, seasonal restrictions, and herding will be used to obtain moderate livestock vegetation use on ONA allotments.

D. Cultural

1. Cultural resource inventories will be required in advance of all surface disturbing activities in accordance with federal regulations and BLM policy.

2. If cultural resources are identified, they must be recorded and evaluated under the criteria of eligibility for the National Register of Historic Places. Impacts from surface disturbing activities must be avoided or mitigated for all eligible cultural resources. The process of evaluation and determination of effect requires consultation and coordination with the Montana State Historic Preservation Officer and the Advisory Council on Historic Preservation.

E. Air Quality

1. Prescribed burns will be coordinated with the Montana state airshed coordinator.

2. Dust abatement and traffic control requirements may be necessary to minimize particulate matter in the air, should any of the "grandfathered" oil and gas leases within the Blind Horse ONA boundary be developed.

3. Venting and flaring of the wells will not be allowed if not economically justified or if in violation of state or federal air quality standards. Should venting and flaring of the wells occur, an approved H2S contingency plan and proper fire abatement procedures must be in place.

4. Vapor recovery units may be required to reduce or eliminate noxious or toxic gases, should oil-gas production facilities be placed adjacent to an ONA boundary.

F. Oil-Gas and Minerals

1. Oil-Gas

   a. Oil and gas leases will use the guidance of the HRMP and the Ear Mountain Addition Amendment.

   b. Seismic notices and operational requests will be reviewed on an individual basis and stipulations from the Rocky Mountain Front Wildlife Guidelines will be applied as necessary.

2. Locatable Minerals

   a. Public lands within the ONAs will remain open to mineral entry as defined in the HRMP. An approved plan of operations will be required on all activities (43 CFR 3809.1-4(b)3) should a claim be staked, except casual use (as defined in 43 CFR 3809.1-2). "Operations" includes all activity associated with exploration, assessment work, development and processing of mineral deposits located under the mining laws. Valid existing lease rights within the boundaries of an ONA will be honored.

   b. Bonding will be required of all operations, except for casual use, to ensure adequate rehabilitation.

   c. Disturbed site rehabilitation measures will consider wildlife food and cover replacement.

   d. Locatable minerals exploration and mining operations are regulated so as not to cause unnecessary and undue degradation. However, prevention of unnecessary and undue degradation may not prevent significant impacts to wildlife and other resources.

   During the permitting process, BLM will seek voluntary cooperation from individual operators to lessen the impacts on non-mineral resources.

   e. Mining operators exploring in crucial wildlife habitat may be required to rehabilitate their previous mining disturbances prior to initiating new surface disturbing activities. This action will allow mining operations to continue while rehabilitating wildlife habitat at the earliest time.

3. Mineral Materials

   a. There will be no common variety (sand, gravel, etc.) mineral removal allowed within the ONAs.

G. Lands

1. All BLM-administered land will be retained in federal ownership.

2. Land acquisition will normally be on a "willing seller basis."

3. ONAs will be avoidance areas for rights-of-way, leases and permits which require development or disturbance. A minimum of one public access route will be acquired into three of the ONAs (Blind Horse, Chute Mountain and Deep Creek-Battle Creek).

4. Communications site rights-of-way will not be allowed within the ONAs.

5. The Blind Horse ONA will require one access route to be acquired by 1993. The Ear Mountain ONA has an existing legal access from the Teton Country road in the northeast corner of the ONA, as well as foot access from May 15 through December 1 through the MDFW&P Ear Mountain Wildlife Management Area. Therefore no additional access routes will be required. Additional public access exists through the Lewis and Clark National Forest from the west. The Chute Mountain ONA will require one access route to be acquired by 1993, to provide legal access from the east, and the Deep Creek-Battle Creek ONA will require one-two access routes, both to be acquired by 1993.

6. All access routes will be acquired in accordance with the final State Directors Guidance on Access. The draft guidance, issued August 1988, proposed acquisition within 5 years.

A willing buyer-willing seller arrangement to achieve this public access will be attempted in all cases. BLM has other tools for acquiring access, such as land exchanges, direct purchase of land or land rights, or long-term use agreements providing for public access. As a last resort, condemnation can be used. All efforts to acquire access, with an agreement that is equitable to all parties involved, will be exhausted before condemnation is used.

H. Watershed

1. Livestock grazing will be intensively managed to improve vegetative cover throughout the watershed in all ONAs. Monitoring techniques as outlined in the AP Range-Livestock section will be used to determine an upward trend in vegetative cover.

2. BLM will consider an alternate grazing method or exclude livestock by fencing, if improvement is not apparent within two grazing cycles after AMP implementation.

3. BLM will intensively manage the south fork of Deep Creek riparian area to improve streambank vegetation and stability by implementation of an AMP which may include fencing, alternate water development, and other measures.

4. Water quality will be maintained or improved to meet wildlife, fisheries, and public water quality needs. BLM will claim all water rights within the ONAs. The claims will be for existing or proposed livestock and wildlife water sources in which BLM has a vested interest. Projects funded entirely by the permittee or other parties could be held by the contributing party. In such an event the contributing party will be required to sign a stipulation relinquishing to the BLM any right to the water upon loss of grazing preference. All vegetative increases will be dedicated to wildlife and watershed resources. Oil-gas activities must meet federal water quality standards. BLM has no authority to enforce state water quality standards. However, federal standards are generally equal or more stringent than state standards.

5. Oil and gas activities for valid existing leases as well as any other surface disturbing activities around water sources will adhere to state and federal regulations.

I. Soils

1. All surface disturbing activities will avoid the Garlet, Loberg, Starman, and Whitore soil series of Upland Woodlands, except for critical locations where trails or roads cross. Water erosion hazard is severe or very severe on these soils, if vegetation is removed, due to their dominantly steep and very steep slopes and relatively thin topsoil.

2. All land disturbances will avoid wetland sites, riparian communities, and areas with slopes exceeding 25% for more than 250 feet in length. Location of these crossings shall be selected by an interdisciplinary team consisting of a wildlife biologist, hydrologist, civil engineer, and soil scientist.

3. Every attempt shall be made to limit land disturbances in Foothills Grasslands.

J. Noxious Plants

1. The BLM will implement the Integrated Pest Management (IPM) program to reduce or eradicate noxious plants in the ONAs, with emphasis on biological control. Herbicides, mechanical or manual methods can be used under the IPM program along roads, trails, and on small upland infestations to contain or eradicate specific noxious plants on BLM-administered areas. The biological agents approach is the preferred method, however, chemicals or mechanical control efforts may be applied if biological agents are unavailable, or the size of infestations (small, isolated) makes biological agents impractical. Biological agents will not include sheep or goats.

K. Fire

1. Wildfires

   a. Wildfires: The U.S. Forest Service will continue as the head agency and would use appropriate suppression action in ONAs, including heavy equipment only when necessary to prevent spread to adjacent private land. Normal suppression techniques will include pumper trucks and hand-line construction crews. Air attacks are permissible in initial attack to prevent fires from spreading to adjacent private lands. The initial action agency (USFS) will locate fire camps and associated facilities outside the ONAs.

2. Prescribed Burns

   a. Specific areas ("wolfy" rough fescue and/or Idaho fescue grassland benches, decadent aspen groves) where prescribed burns can improve vegetation condition will be inventoried and prioritized by 1990. The highest priority for burning will be given to benches important as bighorn sheep and elk winter range.

L. Administrative Access

1. The ONAs are closed to all forms of motorized vehicles.

2. Administrative vehicular access will be allowed to agency personnel for project and range allotment monitoring, and resource use evaluations.

3. Livestock permittees will be allowed administrative access on a permit basis to administer their livestock lease (to include, but not limited to: spring, pipeline, and fence maintenance, salt dispersal, livestock inspection and veterinarian care) subject to stipulations imposed by the BLM. Every attempt will be made to limit administrative access, where practical, to designated roads and trails. In all cases, administrative access will be by permit.

4. Seismic activity conducted by ground travelling motorized vehicles will be allowed access on a permitted basis, limited to designated roads/trails and subject to stipulations imposed by the agency. Cross-country motorized travel for seismic exploration will not be permitted.

FINDING OF NO SIGNIFICANT IMPACT

Based on the facts and circumstances presented in the subject environmental assessment, it is determined that there will be no significant impact to the quality of the human environment, and that an environmental impact statement is not required.

This decision will be implemented no sooner than 30 days after receipt of this publication by the public, and is subject to administrative review. Questions regarding this decision should be sent to the Bureau of Land Management, ATTN: Doug Burger, Area Manager, Great Falls RA, P.O. Box 2865, Great Falls, MT 59403.

APPROVED BY: Douglas J. Burger

Area Manager, Great Falls RA
Great Falls, MT 59403

Rocky Mountain Front
Outstanding Natural Area
Activity Plan / Environmental Assessment

FINAL

MARCH 1989

SUMMARY

This Coordinated Activity Plan addresses four Outstanding Natural Areas (Blind Horse, Ear Mountain, Chute Mountain, Deep Creek-Battle Creek). These areas total 13,087 acres, and are located on the Montana Rocky Mountain Front Range about 20 miles west of Choteau (see Figure 1).

The ONAs feature massive limestone cliffs and geologic features rising to 7,700 feet from 5,000-foot plains. The prominent geographic features include: Blind Horse Creek, Deep Creek, Battle Creek, Ear Mountain, and Timber Gulch (see Figures 2, 3, 4, and 5). The area is blanketed with conifers, hardwoods, softwoods, shrubs, and grasses. The highly dissected topography supports numerous wildlife and some fisheries; and has a nearly pristine wilderness quality.

The Headwaters Resource Management Plan/Environmental Impact Statement (1984) established broad management direction for these ONAs to "protect the wildlife habitat, scenery and other surface resources from disturbance" and "to ensure they are managed essentially as wilderness." The purpose of this activity plan (AP) is to provide specific objectives, constraints, and management policy for all proposed actions on the ONAs. This activity plan does not amend the Headwaters Resource Management Plan. The activity plan will be modified periodically within the National Environmental Policy Act and BLM administrative processes as significant needs arise.

Six major problems or issues were identified by the staff and public: legal access, seismic activities, resource developments, overnight camping, noxious plants, and fire management and use. This AP is directed at addressing these issues.

This final AP contains the Preferred Activity Plan.

A substantial number of agency resource use objectives and constraints such as the Endangered Species Act, related wildlife recovery plans, and specific direction from policy, law, and natural circumstances were identified in the HRMP. These have been addressed and incorporated in this AP. The purposes and management direction of this AP are summarized in the Activity Plan Policy Statements and Management Direction sections of this document.

Supplemental resource information and specific public participation and coordination information is given at the conclusion of the Appendix section.

The following digest summarizes the plan.

Activity Plan

This plan is the desired ONA management plan.

The principle wildlife objectives will be achieved through livestock grazing lease plans. Livestock management will be a primary means to enhance riparian communities, fescue grassland benches, and similar environs important as wildlife habitats. Grizzly bear and gray wolf habitat enhancement will be emphasized.

Legal and physical access to the boundary of three ONAs (Blind Horse, Chute Mountain and Deep Creek-Battle Creek) will be secured to permit public use of wildlife and scenic resources through hunting, fishing, photography, and viewing. Such access currently exists to the Ear Mountain ONA.

The Rocky Mountain Front Wildlife Guidelines will be strictly adhered to if seismic activities are proposed. Administrative vehicle access will be permitted for limited activities, including potential livestock operations, seismic activity, and wildlife management. Every attempt will be made to limit administrative access, where practical, to designated roads and trails. In all cases administrative access will be by permit.

Camping will be permissible throughout the year, but monitored to determine any detrimental impacts on spring grizzly bear use or winter ungulate use relative to the gray wolf. Camping policy changes will be made in response to monitoring results to protect the wildlife resources.

The visual resources management rating for the ONAs will be changed from Class II to Class I, except for trailheads. Specific guidelines and restrictions will be applied to all ONAs to implement the off-road vehicle (ORV) designations and closures throughout all ONAs (see Figures 10-13 in Appendix 6). Every attempt will be made to limit administrative access, where practical, to designated roads and trails. Camping will be permitted throughout all ONAs, except at the Ear Mountain trailhead. All ONA boundaries will be signed for avoidance areas, ORV regulations, noxious plant control efforts and essential information. Trailheads will be developed as ONA access is acquired, with various degrees of public facilities at each. Camping will be precluded within 200 feet of all springs or similar water sources.

Livestock management will be intensified to improve general vegetation communities; to enhance the grizzly bear and gray wolf prey base; and to improve general wildlife habitats. Livestock forage will be evaluated and monitored to better manage BLM-administered lands.

The activity plan will focus on livestock and range resource management by implementing more intensive grazing practices to protect the forage from grazing during part of the growth season. Season-of-use restrictions, herding or (as a last alternative) fencing from grazing will be implemented where grazing pasture management is not practical. The activity plan livestock management practices for each grazing allotment in the ONAs are shown on Table 1.

TABLE 1

ACTIVITY PLAN LIVESTOCK MANAGEMENT PRACTICES

Allotment	Method of Grazing	Preferred Management Category	Existing Range Improvement
Chicken Coulee	Pasture Rotation(exists)	I (improve)	Yes
East Front	Pasture Rotation	I (improve)	Yes
Cow Track	Season Restriction	M (maintain)	No
Green Timber	Herding	I (improve)	No
McCarthy	Season Restriction	C (custodial)	No
Ear Mountain-TNC	Season Restriction	M (maintain)	No

Integrated pest management methods will be used to control noxious plants, with an emphasis on biological control agents.

Cultural resources will not be inventoried on the ONAs, but site specific evaluations will be required for all proposed actions in the ONAs to ensure resource data integrity. Avoidance, rather than mitigation, of located cultural resources will be the preferred procedure.

Air quality in the ONAs is currently Class II and the BLM is obligated by law to maintain that without exception. A Class II air quality area is defined as: "Any area cleaner than federal air quality standards which is designated for a moderate degree of protection from future air quality degradation. Moderate increases in new pollution may be permitted in a Class II area." Oil-gas activities, prescribed burning, and other pollutant generating, federally sanctioned actions will meet air quality standards.

Oil-gas exploration and development will be managed as they were prior to the HRMP. Minimal regulation criteria were applied to the ONAs when leased in the early 1970s. Oil-gas leases issued in the "No Lease" portions of the ONAs will not be reoffered upon lease expiration. The ultimate objective is to have only the 1/4-mile border of each ONA under lease with no surface occupancy allowed. When the HRMP is updated or amended, there is the possibility that advances in drilling and exploration technology may allow some of the ONA No Lease portions to be leased with NSO stipulations without degrading the outstanding resources, values, and natural characteristics of the ONAs. All oil-gas leases will be required to follow the RMF Wildlife Guidelines. The ONAs will remain open to locatable mineral entry and development; however, there will be no removal of common saleable minerals (gravel, sand, rock).

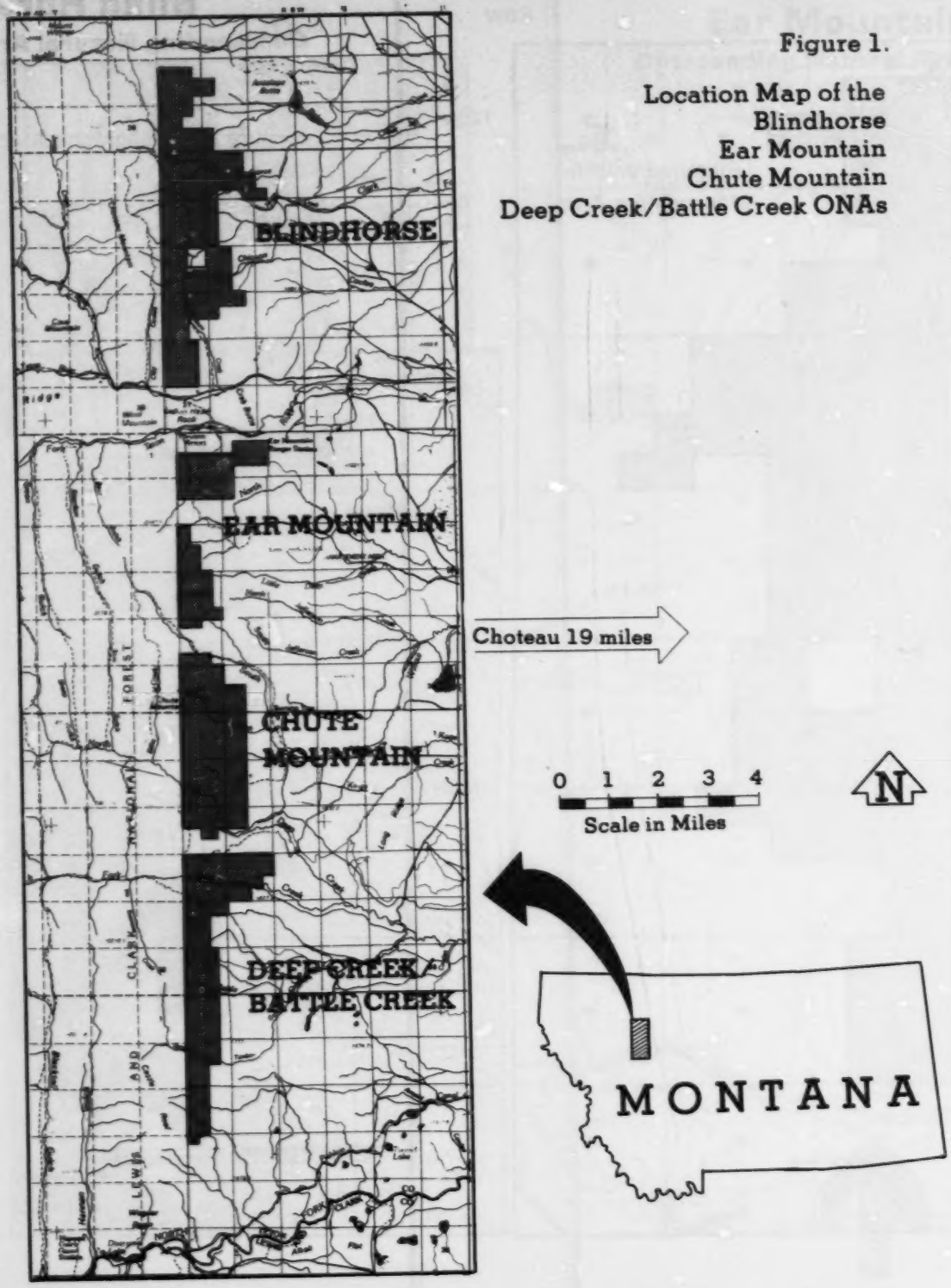

Figure 1.

Location Map of the
Blindhorse
Ear Mountain
Chute Mountain
Deep Creek/Battle Creek ONAs

Blind Horse
Outstanding Natural Area

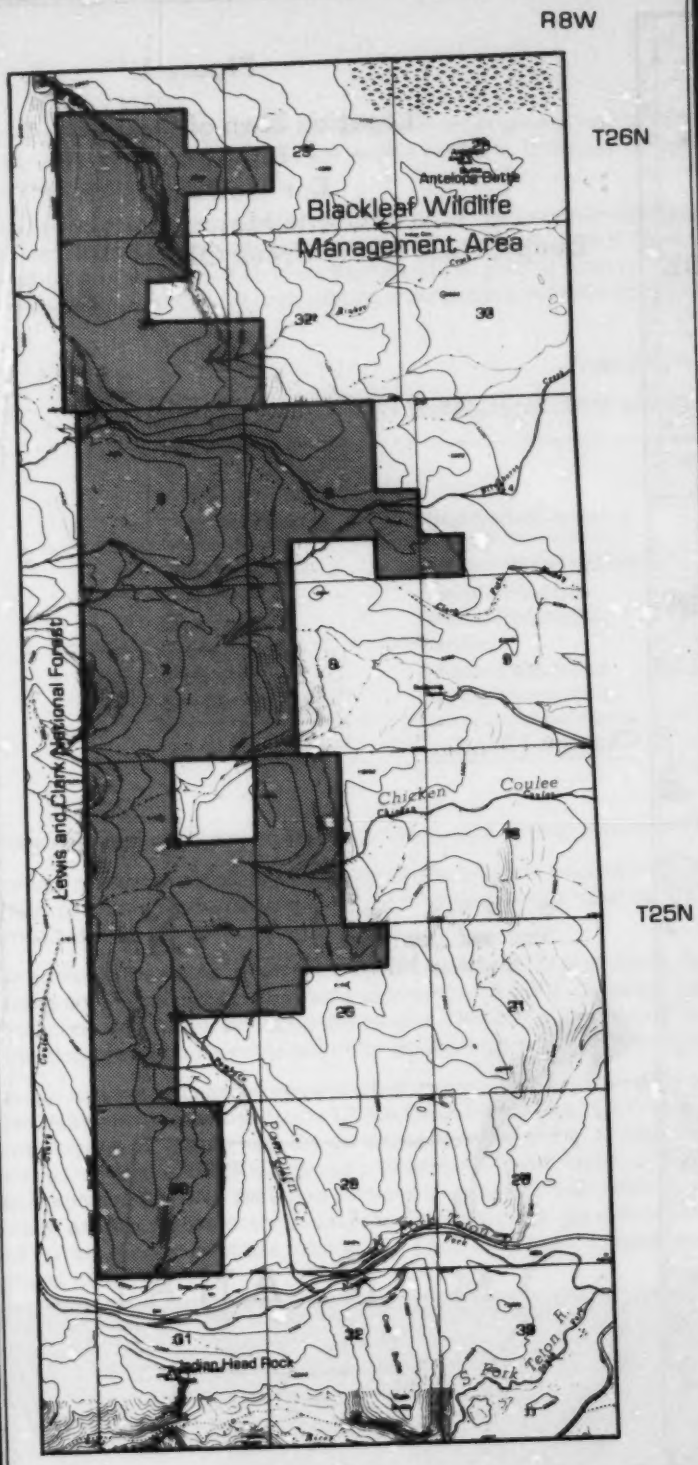

Figure 2. Topographic Map.

ONA Area

Ear Mountain
Outstanding Natural Area

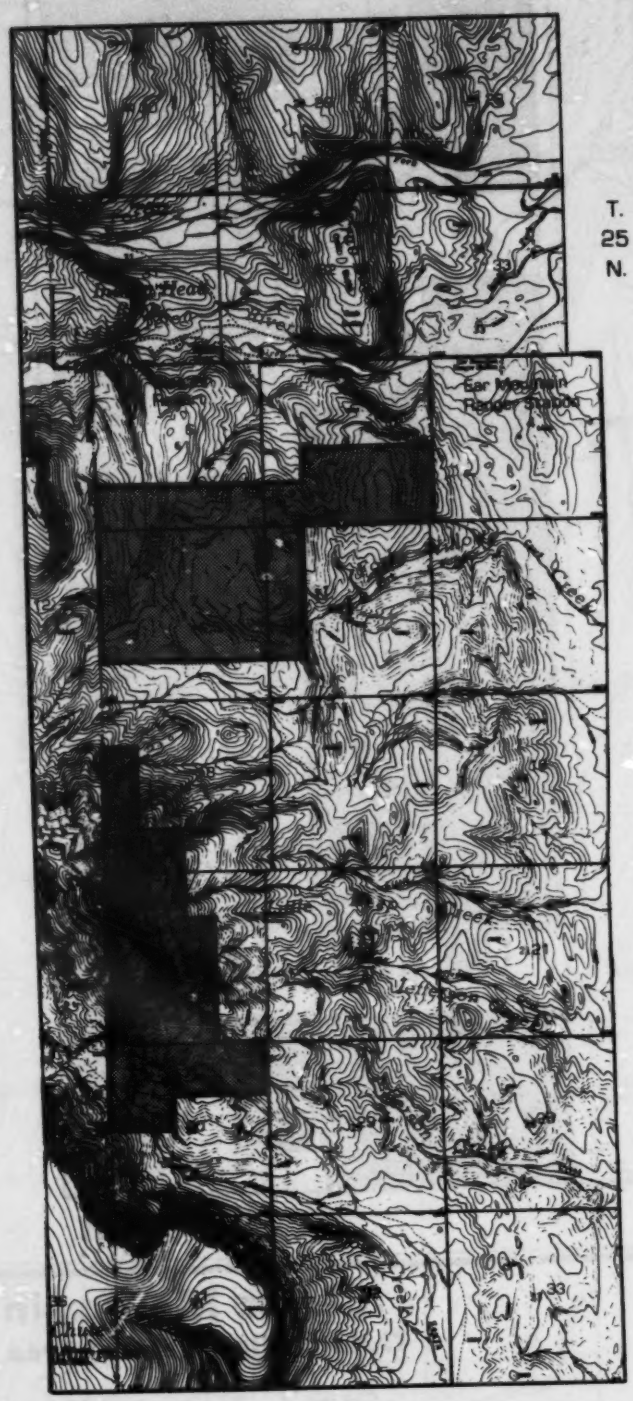

Figure 3. Topographic Map.

ONA Area

NORTH

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0 1 2 3 Kilometers

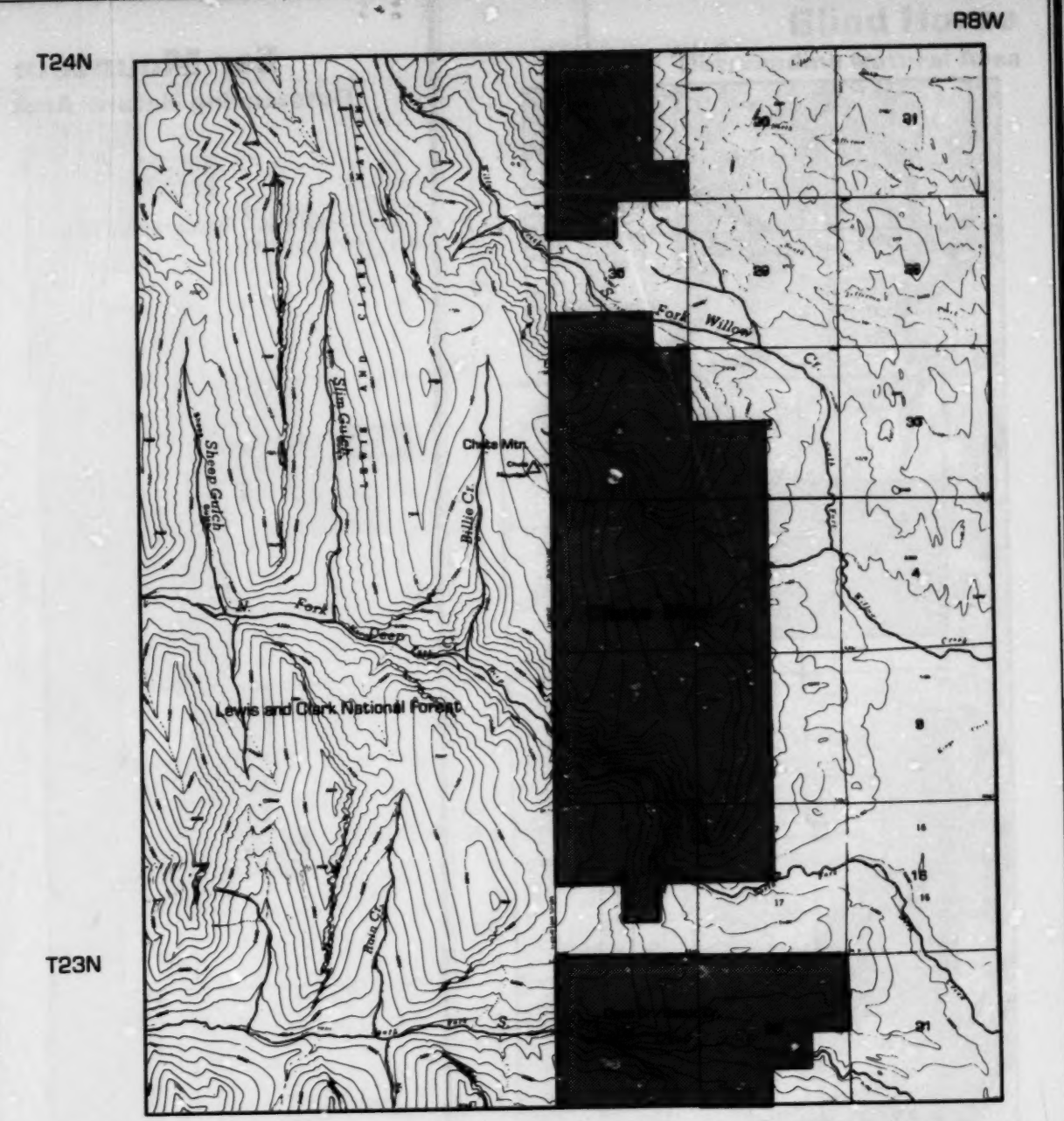
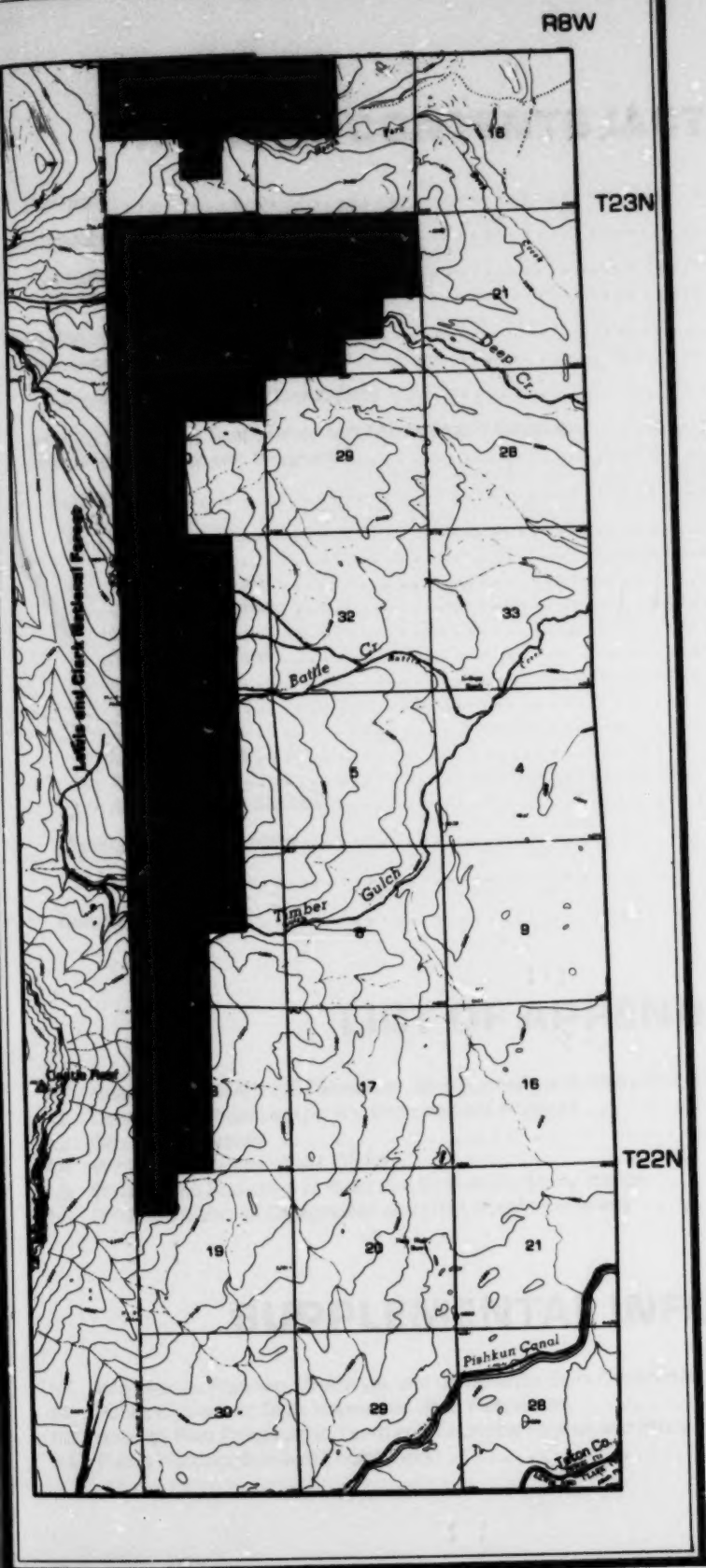


Figure 4. Topographic Map.

Deep Creek / Battle Creek

Outstanding Natural Area

Figure 5. Topographic Map.



ONA Area

NORTH

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0 1 2 3

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TABLE OF CONTENTS (ACTIVITY PLAN)

Summary vx

Introduction 1

Location and Setting 1
Plan Purposes 2

Identification of Major Issues 3
Resource Management Objectives 4

Resource Management Constraints 9

Activity Plan Policy Statements and Management Direction 12
Resource Management Program 15

Activity Plan 15

A. Wildlife 15
B. Recreation 16
C. Range (Livestock) 16
D. Cultural & Historic 21
E. Air Quality 21
F. Oil-Gas, Minerals 21
G. Lands 23
H. Watershed 23
I. Soils 23
J. Noxious Plants 23
K. Fire 24
L. Administrative Access 24

Monitoring and Evaluation 25

Activity Plan 25

References 27

LIST OF APPENDICES

A1 Headwaters RMP/EIS Resources Management and Policy Direction A-3
A2 Livestock (Range) Leases and Improvement Projects A-7
A3 Oil and Gas Leases A-13
A4 Wildlife Resources of the ONAs A-23
A5 Endangered Species Act Biological Evaluation/Consultation A-25
A6 Off-Road Vehicles Designation and ONA Avoidance Areas A-37

SUPPLEMENTAL INFORMATION

S1 Woodlands, Riparian, Wetlands, and Grasslands Soils Descriptions A-47
S2 Public Critique of ONA Issues and BLM Responses A-48
S3 Activity Plan Preparation Team and Technical Review and Procedural Group A-54
S4 Public Participation and Coordination A-54

LIST OF FIGURES

F 1 General Location iv
F 2 Blind Horse ONA v
F 3 Ear Mountain ONA vi
F 4 Chute Mountain ONA vii
F 5 Deep Creek-Battle Creek ONA viii
F 6 Blind Horse ONA Livestock Grazing A-9
F 7 Ear Mountain ONA Livestock Grazing A-10
F 8 Chute Mountain ONA Livestock Grazing A-11
F 9 Deep Creek-Battle Creek ONA Livestock Grazing A-12
F10 Blind Horse ONA Avoidance Areas A-39
F11 Ear Mountain ONA Avoidance Areas A-41
F12 Chute Mountain ONA Avoidance Areas A-43
F13 Deep Creek-Battle Creek ONA Avoidance Areas A-45
F14 Blind Horse ONA Oil and Gas Stipulations A-15
F15 Blind Horse ONA Oil and Gas Leases A-16
F16 Ear Mountain ONA Oil and Gas Stipulations A-17
F17 Ear Mountain ONA Oil and Gas Leases A-18
F18 Chute Mountain ONA Oil and Gas Stipulations A-19
F19 Chute Mountain ONA Oil and Gas Leases A-20
F20 Deep Creek-Battle Creek ONA Oil and Gas Stipulations A-21
F21 Deep Creek-Battle Creek ONA Oil and Gas Leases A-22

LIST OF TABLES

T 1 Preferred Plan Livestock Management Practices vxi
T 2 ONA Areas Not Available for Livestock Leases 10
T10 Proposed Range Improvements—Chicken Coulee Allotment 17
T11 Pasture Acres/Capacity AUMs 19
T12 Proposed Range Developments East Front Allotment 20
T13 Preferred Action Plan Oil and Gas Development 22

ACRONYMS

AMP—Allotment Management Plan

AP—Activity Plan

BCF—Billion Cubic Feet

BLM—Bureau of Land Management

BMU—Bear Management Unit

CEM—Cumulative Effects Model

DSL—Montana Department of State Lands

EA—Environmental Assessment

EIS—Environmental Impact Statement

EO—Executive Order

HMP—Habitat Management Plan

HRMP—Headwaters Resource Management Plan

MDFWP—Montana Department of Fish, Wildlife and Parks

NEPA—National Environmental Policy Act

NSO—No Surface Occupancy

ONA—Outstanding Natural Area

ORV—Off-Road Vehicle

PPM—Parts Per Million

RMA—Recreation Management Area

RMF—Rocky Mountain Front

RMP—Resource Management Plan

ROS—Recreation Opportunity Spectrum

SCS—Soil Conservation Service

SHPO—State Historic Preservation Office

SRMA—Special Recreation Management Area

USFS—U. S. Forest Service

USFWS—U. S. Fish and Wildlife Service

VRM—Visual Resource Management

INTRODUCTION

The Headwaters Resource Management Plan/Environmental Impact Statement (EIS), July 1984, and the subsequent Record of Decision (ROD) designated four Outstanding Natural Areas (ONAs) on the Rocky Mountain Front, Teton County, Montana (see Figures 2-5). The acreage for each ONA is:

1.	Blind Horse	4,927 acres
2.	Ear Mountain	1,869 acres*
3.	Chute Mountain	3,205 acres
4.	Deep Creek-Battle Creek	3,086 acres
Total		13,087 acres

*A planning amendment to the Headwaters RMP/EIS, December 1986, added 1,029 acres of acquired land to the Ear Mountain ONA. A 12.75-acre area was designated as a multiple-use area for a trailhead, and is not included in the ONA.

Outstanding Natural Areas are defined in 43 CFR 2071.1 as: "Areas of outstanding scenic splendor, natural wonder, or scientific importance that merit special attention and care in management to ensure their preservation in their natural condition. These usually are relatively undisturbed, representative of rare botanical, geological or zoological characteristics of principal interest for scientific and research purposes."

[redacted] and to ensure that the ONAs be "managed essentially as wilderness" (Alternative A, Preferred, p.iii, final

This multi-resource Coordinated Activity Plan (AP) will not amend the Headwaters Resource Management Plan (HRMP). This AP is governed by the broad objectives, policy, and management direction derived from the HRMP.

A primary end product of this AP, relative to each resource, is to establish concise and functional policy direction with supporting appendices, maps, and explicit information. This will enable the public and the Bureau of Land Management (BLM) staff to readily determine the correct management direction for any resource use situation.

This AP will be modified periodically as significant needs arise. Any modification will be consistent with the National Environmental Policy Act (NEPA) and the BLM administrative processes.

LOCATION AND SETTING

The four ONAs, which total 13,087 acres, adjoin the eastern edge of the Lewis and Clark National Forest. The Bob Marshall Wilderness, administered by the Forest Service, lies about 6 miles west of the ONAs. The ONAs are located approximately 19 miles west of Choteau, Montana (see Figure 1).

The Rocky Mountain Front Range (RMF) rises dramatically from the plains. Elevation changes are precipitous, and range from 5,100 to 7,700 feet on the ONAs. The ONAs are characterized by steep, rocky cliffs; narrow, deep canyons; talus slopes; open meadows; shrub-grasslands; and numerous streams, both perennial and ephemeral. Massive limestone formations including pinnacles dominate many vistas.

Some prominent geographic features of the ONAs include: Blind Horse Creek, Chute Mountain, the North and South Forks of Deep Creek, Deep Creek Canyon, Willow Creek, Edwards Creek, Battle Creek, Timber Gulch, and Ear Mountain.

Most of the ONAs are forested with limber pine, Douglas-fir, subalpine fir and aspen. Alpine meadows, foothills prairie, and barren areas support mountain shrubs, sedges, grasses, numerous flowering perennials, and forbs.

The ONAs have a high overall wilderness quality. They are nearly pristine, with outstanding opportunities for both solitude and primitive recreation. There are few human intrusions evident today, although heavy equipment used for seismic work in the early 1950's left visible scars. A limited number of internal access trails and primitive vehicle ways exist on all the ONAs. Various livestock fences also exist on three ONAs.

The grizzly bear, bald eagle, gray wolf, and peregrine falcon are either threatened or endangered species that occur, or are suspected to occur, in the ONAs. The ONAs provide seasonal habitat or year-long habitat for elk, mule deer, mountain goat, bighorn sheep, black bear, numerous raptors, mountain grouse, and passerine species, as well as year-long aquatic habitat for native cutthroat and rainbow trout.

All the ONAs, except Ear Mountain, have internal trails which afford an almost unlimited opportunity for non-vehicular travel. These horse and human foot trails, many of which connect with USFS trails to the west, provide opportunities for rock climbing, camping, fishing, day hiking, backpacking, horseback riding, snowshoeing, cross-country skiing, hunting, photography, non-motorized mountain bikes, bird watching, rock hounding, and solitude.

Cultural resources along the RMF consist of prehistoric and historic remains dating from 11,000 years ago to the advent of the Modern Era in the 1920s. Most of the prehistoric remains represent aboriginal campsites and special activity sites such as: quarries for extracting stone for tool making; areas for gathering religious and medicinal plants; areas and structures for hunting various game and fur-bearing animals; and structures for conducting religious ceremonies. Historic remains consist of mining sites (including adits, cabins, mills, prospect holes, water developments, kilns and mining towns) and sites related to late 19th century Euro-American settlement such as ranch buildings, irrigation projects, line shacks, and roads.

The ONAs have not been inventoried for cultural resources, but if they follow the general pattern for the RMF, they probably contain prehistoric campsites and special activity sites in limited quantities. Although not professionally documented, one prehistoric campsite is known to exist in the Blind Horse ONA. It is expected that some of the higher prominences also support aboriginal religious sites (vision quest structures). The only historic site or feature known in the ONAs is a water diversion structure or flume in the vicinity of Chute Mountain. Other historic sites are probably rare in the ONAs because of the terrain and lack of suitable resources for extraction by Euro-Americans (mining resources, timber, agricultural lands, etc.).

The ONAs are largely leased for oil and gas, and are considered to have a high development potential for gas. Approximately 59% of the ONAs are leased for oil-gas under the No Surface Occupancy stipulation. Much of the adjacent national forest on the west side of the ONAs is leased for oil and gas.

The four ONAs are cataloged under the Lewistown District recreation program as Special Recreation Management Areas (SRMAs), MT-068018. This means certain recreational values in the areas have been recognized and that management objectives have been established to protect and/or enhance the particular resources. These units are currently ranked 5th out of the 20 BLM recreation management areas (RMAs) in the district and in the top 25% statewide.

The visual resource management (VRM) rating for the public land along the Rocky Mountain Front Range is Class II. The VRM rating for the ONAs is Class I, except for the trailheads which are Class II. Any developments or activities authorized in the ONAs will conform to mitigative measures approved in the contrast rating evaluation to preserve the excellent scenic quality.

The recreation opportunity spectrum (ROS) for the ONAs consists of two categories. The areas along the existing roads within the ONAs are considered semi-primitive motorized; and the remaining BLM-administered land is semi-primitive non-motorized. These classes are defined in the ROS Users Guide, USDA Forest Service, 1982.

PLAN PURPOSES

Since the HRMP did not provide specific direction for full plan implementation on the ONAs, this activity plan will provide the BLM and public with specific ONA management direction.

The HRMP directs land use allocations or objectives for resource programs through the resolution of specific issues. This AP is required to fully implement the management direction of the RMP for the Rocky Mountain Front ONAs.

Some of the RMF, which covers an expansive area along the eastern side of the Continental Divide, has been and continues to be an area of considerable human activity. Oil and gas exploration and development has occurred in the past 35 or more years, and the future appears to hold more of the same. Livestock interests have most of the area under lease. However, more active management of livestock grazing on BLM-administered land is necessary. Outdoor recreation is a primary activity throughout the year. Dude ranching, photography, hiking, fishing, cross-country skiing, and hunting are the major recreational uses in the surrounding areas.

The scenic quality and wildland resources are the primary values that resulted in designation of these four areas as ONAs. Threatened and endangered wildlife, such as the grizzly bear and gray wolf and their habitats, are an integral part of these areas.

The preservation and enhancement of these resource values constitutes the major management objectives to be followed in this activity plan.

Because these four ONAs are similar in biotic and abiotic resources and are geographically close to one another, one activity plan will be prepared to address the four ONAs.

IDENTIFICATION OF MAJOR ISSUES

The following subjects were identified by public responses and internal agency review to the question: "What are the major or significant problems that the BLM and the public must address in the preparation of this AP?"

1. There is no legal or physical public access to the Deep Creek-Battle Creek, Chute Mountain, and Blind Horse ONAs (from the eastern slopes).

Two associated questions are:

"Should trail development for pack strings and hiking take place after public access is secured to an ONA?"

"Should seasonal restrictions be applied to access roads/trails to prevent harassment of bighorn sheep and mule deer in the winter, or grizzly bear during the spring?"

2. To what extent should seismic exploration be allowed in the ONAs?

3. What type of resource developments should be allowed within the ONAs?

Examples include: Range (livestock) facilities such as fences, water developments; wildlife improvements such as riparian protection fences; recreation site management facilities such as parking, garbage collection, boundary and facility signing; and other development such as pipelines and powerlines.

4. Should overnight camping be allowed, or day use only?

5. How will noxious plants (weeds) be controlled?

6. How should wildfire be controlled; and should prescribed fire be permitted for wildlife habitat or livestock forage improvements?

RESOURCE MANAGEMENT OBJECTIVES

The following management direction is derived from the HRMP and establishes specific objectives for the ONAs. Please refer to Appendix 1 for the compendium of HRMP management direction.

Wildlife and Fisheries

This AP will provide protection and management direction for: unique plants in the ONAs; the critical habitat of the threatened grizzly bear; prey base habitat for the endangered gray wolf; and important seasonal habitat for numerous wildlife species including elk, mountain goat, deer, bighorn sheep, black bear, mountain lion plus various raptors and upland birds. An inventory of rare-unique plants was completed in the summer of 1988, in cooperation with the Montana Natural Heritage Foundation "challenge grant funding program."

The overall objective of a Rocky Mountain Front Range Wildlife Habitat Management Plan developed in the early 1970s, was to improve or maintain habitat for approximately 200 species of wildlife. Some objectives of that draft document have been accomplished and need not be carried forward, while other objectives relate to areas outside the ONAs and will not be discussed in this Activity Plan. However, other objectives are still applicable and valid for the ONA wildlife and are carried forward as listed below by species. Some modifications of objectives, to reflect current data and situations, have been made.

The wildlife and fisheries objectives from the HRMP are to:

Bighorn Sheep

Improve habitat conditions and provide adequate forage on the Deep Creek winter range in order to maintain a bighorn sheep population of 150 to 175.

Improve winter range conditions and provide adequate forage on the Sun River, east of Gibson Dam, to maintain the bighorn sheep population of approximately 250.

Determine the feasibility of expanding and/or improving available bighorn sheep winter/spring habitat by reducing the dense forest canopy and increasing grass, forb, and shrub composition in the Deep Creek area.

Improve 800 acres of federal bighorn sheep winter/spring habitat between the North Fork of Deep Creek and Edwards Creek by increasing the Idaho fescue and total forb composition from 15% and 8% respectively to 30% and 15% respectively by the year 2000.

Acquire additional bighorn sheep winter/spring range through a land exchange program.

Continue the cooperative Montana Department of Fish, Wildlife, and Parks (MDFW&P) and BLM vegetative studies on federal bighorn sheep habitat to evaluate and monitor habitat composition, condition, trend, utilization levels, and interspecific competition between domestic livestock and bighorn sheep.

Improve Idaho fescue composition and vigor for bighorn sheep winter/spring forage on the lower elevation Deep Creek winter range area by the year 2000. The bighorn sheep habitats will be evaluated at least annually on transect 107 using the Daubenmire (1959) methodology.

Continue with the Chicken Coulee livestock grazing allotment management plan (AMP), as implemented, to provide adequate forage for the bighorn sheep population now established there.

Mule and White-Tailed Deer

Maintain existing creeping juniper stands and plant productivity on the Sun River-Green Timber Gulch, Deep Creek, Ear Mountain, and Chicken Coulee winter/spring ranges at no less than 10% canopy coverage and no more than 20% dead crown measured annually, using the Daubenmire (1959) method.

Improve deer summer habitat conditions by providing potable water sources within 1/2 mile of any point on federal land within the ONAs by 1990.

Improve habitat conditions and provide adequate forage on the Chicken Coulee winter/spring range in order to maintain a mule and white-tailed deer population of 300 to 350.

Rocky Mountain Goat

Improve habitat conditions and provide adequate forage on the Deep Creek and Ear Mountain areas in order to increase the mountain goat population from 50 to 75 by the year 2000.

Assist the MDFW&P in meeting Montana Strategic Plan objectives by improving habitat conditions and providing adequate forage on the Choteau Mountain-Chicken Coulee yearlong habitat area in order to increase mountain goat numbers to approximately 25-30 by the year 2000.

Rocky Mountain Elk

Improve bunchgrass composition and vigor for elk winter/spring forage on the Deep Creek area from 13% to 20% by the year 2000. This wildlife winter habitat will be evaluated biannually on transect 107, using the Daubenmire (1959) methodology.

Maintain elk winter/spring habitat in Green Timber Gulch (Boadle grazing lease) at the present composition of 15% grasses and 13% forbs. This elk winter habitat will be evaluated annually on transect 110, SE1/4SW1/4, Section 18, T. 22 N., R. 8 W., using the Daubenmire (1959) methodology.

Threatened or Endangered, Nongame, and Species of Special Interest or Concern

Comply with all management restrictions and participate in described goals and monitoring efforts for both the threatened grizzly bear and endangered gray wolf, as given in the recovery plans.

Utilize guidance for management of grizzly bear and grizzly bear habitats as given in both the Interagency Grizzly Bear Committee and RMF Task Force Wildlife Guidelines.

Utilize guidance for management of prey species of the gray wolf as presented in the RMF Wildlife Guidelines.

[redacted]

The following grizzly bear management guidelines from the RMF Task Force publication will be used and are specifically oriented toward livestock grazing:

Livestock grazing in riparian communities will be deferred each year until after July 1.

Cattle will be removed from pastures grazed after July 1, before the riparian forage base is reduced by 50% either by grazing or plant structure damage.

Exceptions to the July 1 livestock use date can be made when a pasture is part of a grazing system that does not cause a decrease in the condition or size of the riparian plant communities.

Fencing riparian habitats that receive high bear use, to exclude livestock grazing and trampling, may be necessary where livestock turn-out dates prior to July are allowed.

Boneyards and livestock dumps are prevalent along the RMF and are frequented by grizzly bears. Ranchers and landowners will be encouraged to place livestock carcasses and garbage at remote areas of their land. Dead livestock should be moved a considerable distance from calving grounds to discourage bears from feeding on carrion and newborn calves. The MDFW&P has an active program to remove livestock carcasses to acceptable locations.

The following research/management recommendations will be considered as livestock allotment management plans are updated.

The condition and trend of all riparian plant communities and their production of sharptooth Angelica, cow parsnip, and western sweet-cicely need to be determined on all RMF public lands grazed by livestock.

Development of special-use pastures is recommended where the condition of riparian plant communities needs improvement. A special-use pasture will be developed where large areas of riparian habitat are enclosed so an adequate forage base will be available to allow stocking rates compatible with livestock operations. Exclosures will be considered if riparian areas are too small. These pastures should be grazed only after July 1, and the livestock should be removed before the use of riparian vegetation reaches 50% or the special use pasture should be incorporated into a deferred rest-rotation system similar to that described by Marlow (1985). Some other methods which may reduce negative impacts to riparian habitats include: development of alternate water sources, placing of salt away from riparian areas, and improved herding practices.

Reestablishment of riparian areas should be attempted where the abundance of important plant species used by grizzlies for cover (aspen, cottonwood, and birch) or food has been reduced.

Protect all identified raptor nesting sites and adjacent habitat by using the RMF Wildlife Guidelines. BLM will continue with inventories to locate additional nesting sites.

From the generic objectives of the HRMP to the more specific objectives of the 1980 Draft Wildlife Habitat Management Plan it is apparent that wildlife objectives can largely be met through implementation of proper grazing management practices on the ONAs, particularly the East Front allotment. Allotment grazing management plans which will meet wildlife objectives are given in the grazing management section of this document.

Additional protection and mitigation to meet ONA wildlife resource objectives can be met by adherence to the RMF Wildlife Guidelines.

RECREATION

Recreation objectives are to:

Continue to provide substantial opportunities for outstanding solitude when considered in relation to the nearby Lewis and Clark National Forest and the Bob Marshall Wilderness.

Maintain VRM Class I guidelines for the ONAs, except for trailheads which are Class II, and retain the existing character of the landscape.

Provide trailhead development at each access point to the ONAs, with varying degrees of development and size of trailhead as the following examples indicate: parking (type of surface, size); sanitation (toilets, garbage); picnic tables; fire rings; potable water; signs (boundary, sites or facilities); trails (hiking, horseback, non-motorized mountain bike).

Provide visitors with a satisfying recreational experience in the ONAs within the semi-primitive, non-motorized ROS class.

Identify specific guidelines for ORV use, including a road network for administrative use and the type of administrative use authorized.

Provide access for hikers, horses, and non-motorized mountain bikes with minimum trail construction and maintenance.

Provide for day-use and overnight camping within the ONAs.

Identify federal lands (ONA boundaries) by signing and inform the visitor of ONA restrictions.

Identify designated routes for use under administrative access.

Allow minimal decrease in ROS ratings (less than 10 acres).

Range-Livestock

The range (livestock) objectives are to provide federal forage to satisfy the existing livestock needs on six ONA allotments in a manner that will not diminish or damage other resources and ONA values; maintain/improve the soil, watershed, and riparian habitat condition; and will benefit wildlife species, including threatened and endangered species. Proposed range developments will not detract from the scenic, wilderness, or recreational values, but will attain the resource objectives.

More specific and measurable objectives have been written for each allotment in the activity plan description in this document.

Cultural Resources

The purpose of the cultural resource management prescription is to provide protection for archeological, historical, and paleontological resources for future scientific use and public enjoyment. This will be accomplished through inventories of all proposed project areas in the ONAs and subsequent avoidance or mitigation of impacts to any significant cultural resources identified. Cultural resources are fragile, non-renewable, and ever dwindling in quality and quantity across the nation. Their protection is mandated by the National Historic Preservation Act of 1966 (as amended), and associated federal regulations.

The BLM will continue to inventory cultural resources in advance of all surface disturbing activities to avoid any cultural resources or mitigate the impacts of surface disturbances. Development proposals must consider that significant sites may be identified in "sensitive areas" (prominent topographic features such as high escarpments, mountaintops, canyons, and stream bottoms where they emerge from steep terrain). Identified cultural resources must be recorded and evaluated under the National Register of Historic Places eligibility criteria, in consultation with the Montana State Historic Preservation Officer and the Advisory Council on Historic Preservation.

Air Quality

Air Quality objectives are to:

Evaluate air quality on an individual basis as part of project level planning, attaching appropriate stipulations as necessary to maintain the Class II airshed rating.

Oil-Gas and Minerals

Oil-gas, minerals objectives are to:

Allow seismic exploration, while retaining the existing character and features of the ONAs.

Continue to lease the ONA boundaries (1/4-mile wide) with No Surface Occupancy stipulations, while not leasing the interior cores of the ONAs.

Lands

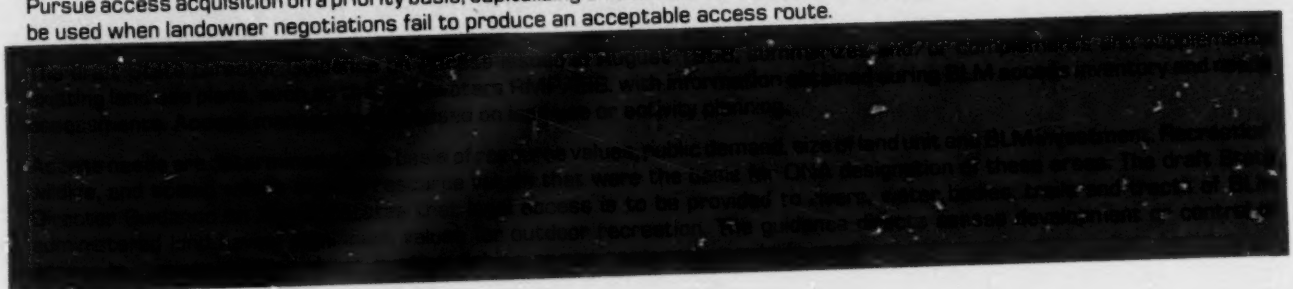
All federal land within the ONAs will be managed as avoidance areas for utility and transportation corridors. Federal land within avoidance areas will not be available for utility and transportation corridor development. Exceptions may be permitted based on consideration of the following criteria: type of and need for facility proposed; conflicts with other resource values and uses including potential values and uses; and availability of alternatives and/or mitigation measures.

Additional objectives are to:

Continue to pursue private land acquisition on a "willing seller" basis.

Terminate new cases of unauthorized use immediately.

Pursue access acquisition on a priority basis, capitalizing on easement acquisition of existing roads. Condemnation authority will be used when landowner negotiations fail to produce an acceptable access route.



Protect existing access to public lands from closure.

WATERSHED

Watershed objectives are to:

Continue to evaluate soil and water resources, on an individual basis, as part of project level planning.

Maintain or improve water quality in accordance with state and federal standards.

Design management activities in riparian zones and wetlands to maintain or improve the habitat condition.

Avoid to the extent possible, road and utility corridor construction associated with valid existing oil and gas rights in riparian areas and steep terrain.

Soils

Soils objectives are to:

Manage soils to maintain productivity and to minimize erosion.

Continue to evaluate soil and water resources on an individual basis as part of project level planning.

ADMINISTRATIVE ACCESS

Administrative access objectives are to:

Allow livestock permittees access to administer their livestock lease.

Allow seismic activity conducted by ground-traveling motorized vehicles on designated roads/trails only on a permitted basis.

Allow agency personnel administrative vehicular access on designated roads/trails only for project and range allotment monitoring, wildlife habitat management, and resource use evaluations.

RESOURCE MANAGEMENT CONSTRAINTS

The following constraints must be adhered to while fulfilling the management objectives identified above. Refer to Appendix 1 for a more complete listing of generic and specific management direction from the HRMP.

Wildlife and Fisheries

Constraints placed on wildlife management by other resource considerations are limited. The most significant constraint is that livestock grazing management has been less than effective on federal lands in two of the four ONAs. Wildlife habitats might be in better condition if livestock grazing was not allowed.

Other constraints could result from managing the ONAs "essentially as wilderness" and could affect wildlife project work if such projects were determined to impair the natural qualities of the ONAs. This is highly unlikely because unobtrusive enclosures and spring developments can be developed. Wildlife habitat is a primary ONA value.

Wildlife management has significantly constrained other resource programs, especially minerals, as identified in the special leasing stipulations of the HRMP. Adherence to the Rocky Mountain Front Wildlife Guidelines also constrains other resource programs.

Recreation

The ONAs are closed to all motorized vehicles (all ORVs, motorized bikes, snowmobiles, ATVs, quads) so as to retain the natural characteristics and fragile land types of the ONAs, and to meet the broad HRMP direction "to protect the wildlife habitat, scenery and other surface resources from disturbance" and "to ensure they are managed essentially as wilderness." Administrative access may be allowed by the authorized officer, for those purposes defined in 43 CFR 8340.05(a) and BLM manual 8342.06(c) and specifically permitted by BLM. Please refer to the Administrative Access sections of this document for more information.

The current BLM manual guidance provides for trailhead location within the ONA boundary as an exception to the ORV closure.

Mountain bikes (non-motorized) are permissible within the ONA boundaries.

BLM-administered land adjacent to, and including the ONAs, is not available for motorcycle events.

The federal lands in the ONAs will be retained in public ownership. This allows for the investment of public funds for new recreation developments such as the trailheads and maintenance of the internal trail system.

Management prescriptions in the AP need to conform with the guidelines of the applicable ROS class in relation to type of activities, settings, and experience opportunities (ROS User Guide, USFS 1982).

Administrative ORV use will be limited to designated routes. No cross-country travel is permissible.

The use of trails may be restricted in early spring and at higher elevations to avoid damage to wet and soft ground. The public is to stay on existing trails, and avoid cutting across switchbacks to reduce erosion and soil loss.

No overnight camping will be allowed at Ear Mountain trailhead. Constraints on future sites will be assessed on an individual basis.

The BLM will use a minimal number of signs and materials and locate them to fit VRM classification guidelines for the ONA. VRM contrast ratings will be completed for any proposed projects in the ONAs.

Range-Livestock

Livestock grazing will be permitted on federal lands in the ONAs in accordance with the HRMP and this Activity Plan (see Figures 6-9, in Appendix 2).

Table 2 shows the ONA tracts that are to remain unleased for livestock grazing as determined in the HRMP.

TABLE 2

ONA AREAS NOT AVAILABLE FOR LIVESTOCK GRAZING LEASES
(As Directed By The HRMP)

ONA Leased Tract	Unleased Unit	Acres	
Blind Horse	Pamburn	192.25	T. 25 N., R. 8 W., Section 19, Lot 4; Section 30, Lots 1, 2, 3
Ear Mountain	Ear Mountain	550.2	T. 24 N., R. 8 W., Section 18, Lots 1, 2, 3, E½SW¼; Section 19, Lots 1, 2, 3, E½NW¼, W½NE¼, NE¼SW ¼, NE¼SE¼
Blind Horse	Rinker Creek	680	T. 26 N., R. 8 W., Section 29, NW¼SW¼, Section 30, S½NW¼SW¼, W½SE¼, NE¼SE¼, SW¼NE¼; Section 31, NW¼NE¼, SE¼; Section 32, NW¼SW¼

These tracts are reserved for bighorn sheep habitat and to provide forage for wintering mule deer, mountain goat and species protected under the Threatened and Endangered Species Act (gray wolf).

The activity plan limits the class of livestock in the ONAs to cattle and horses. Grazing sheep and/or goats in the ONA will not be allowed because of the grizzly bear conflicts. This livestock class policy follows the guidelines recommended by Interagency Grizzly Bear Guidelines and the Interagency Rocky Mountain Front Wildlife Guidelines.

Oil-Gas And Minerals

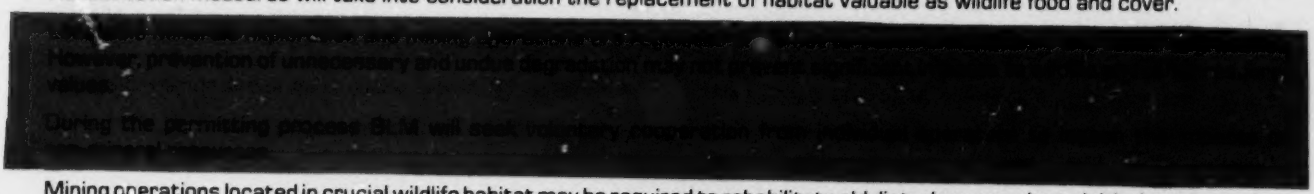
The "No Surface Occupancy" stipulation will continue to be attached to new oil-gas leases (see Figures 14-21, Appendix 3). Valid existing mineral (oil-gas) rights will apply until these leases expire, at which time new lease stipulations will be applied if the leases are reoffered.

All federal land within the ONAs will remain open to mineral (hardrock) entry based on the HRMP. The HRMP will have to be amended and the ONAs withdrawn from mineral entry to exclude hardrock mining from the ONAs.

An approved Plan of Operations will be required on all activities (43 CFR 3809.1-4(b)3), except casual use (as defined in 43 CFR 3809.1-2). "Operations" includes all activity associated with exploration, assessment work, development and processing of mineral deposits located under the mining law.

Bonding will be required on all operations, except for casual use in order to ensure adequate rehabilitation.

Rehabilitation measures will take into consideration the replacement of habitat valuable as wildlife food and cover.



Mining operations located in crucial wildlife habitat may be required to rehabilitate old disturbances prior to initiating new surface disturbing activities. This action will enhance the ability of mining operations to continue while rehabilitating critical wildlife habitat at the earliest possible opportunity.

There will be no removal of common variety minerals (e.g., sand, gravel, rock) within the ONAs.

Geophysical (seismic) exploration within the ONAs will be considered on an individual basis in response to Notices of Intent. Seismic activity will be permitted when proposals are in compliance with applicable federal statutes, the Rocky Mountain Front Wildlife Guidelines, the Endangered Species Act, and management direction from the HRMP/EIS and this activity plan.

No cross-country motorized travel for seismic exploration will be allowed.

Geochemical exploration will be reviewed on an individual basis in the same manner as seismic activities, including the submission of a Notice of Intent to conduct such activities.

LANDS

Motorized Vehicle Access: All ONAs are closed to motorized vehicle (autos, trucks, motor bikes, snowmobiles, and other forms of motorized equipment designed for human transport) access [redacted] New roads within the ONAs will not be permitted, except where valid existing oil and gas leases require a road to develop the lease. The No Lease or No Surface Occupancy stipulation will apply upon expiration of present leases. Interior trails for pedestrian and horse traffic are permissible within the ONAs.

Access By Aircraft: Aircraft shall be limited to a minimum altitude of 600 feet over the ONAs, except search and rescue aircraft, and in landing zones associated with helicopter assisted seismic operations.

All public land in the four ONAs will be retained in public ownership.

No communication site rights-of-way will be allowed in the ONAs.

WATERSHED

Water quality will be maintained or improved in accordance with state and federal standards. Management activities in riparian zones and wetlands will be designed to maintain or improve the [redacted] condition.

Roads resulting from oil-gas development on valid existing leases and utility corridors will avoid riparian areas to the extent practical.

Stream crossings resulting from oil-gas development on valid existing leases will adhere to MDFW&P regulations regarding construction projects in or near fishing waters.

FORESTRY

No timber harvest, post and pole cutting, timber improvement practices, firewood cutting, or Christmas tree cutting will be permitted on the ONAs.

ADMINISTRATIVE ACCESS

Every attempt will be made to limit administrative access to designated roads and trails on a permit basis [redacted]

ACTIVITY PLAN POLICY STATEMENTS AND MANAGEMENT DIRECTION

Wildlife and Fisheries

Grazing systems will be actively and intensively managed, especially the two East Front allotments, to improve important wildlife habitats. BLM will follow the grazing management program for each allotment as described in that section of this activity plan. If an upward trend of vegetation is not apparent within two grazing cycles after AMP implementation BLM may exclude cattle from important wildlife habitats, riparian areas important to fisheries and grizzly bears and fescue/grassland benches important as bighorn sheep winter range. This would be done by fencing an entire area or by fencing out water sources which attract cattle to these important wildlife and fisheries habitats.

Continue intensive grazing management in the Chicken Coulee (Newman) allotment. Refer to the Range (Livestock) Section in this AP for details.

Establish access to eastern ONA boundaries for all ONAs and allow walk-in hunting so that proper game management (regulated harvest) can occur and that the general public can use the wildlife resources.

Allow seismic exploration in ONAs with strict adherence to the RMF Wildlife Guidelines. Be especially careful concerning use of helicopters (e.g, flight paths, above-ground heights, and 9-mile spacing).

Recreation

Public overnight camping will be permitted on BLM-administered land within the ONAs except at the Ear Mountain Trailhead.

Camping restrictions for future trailhead developments will be determined on an individual basis.

Visitors will be advised to follow good bear management practices when camping or hiking in the ONAs.

All access points will be posted with Montana Department of Fish, Wildlife, and Parks bear management signs.

Use of off-road vehicles in the ONAs will comply with stipulations listed under Administrative Access.

ORV barriers will be installed at ONA boundaries to exclude motorized vehicles from existing roads, vehicle ways, and trails .

Non-motorized travel on trails may be restricted during early spring thaw to avoid damage to wet and soft ground.

Authorized vehicle travel will be restricted to designated roads and trails.

VRM contrast ratings will be completed for all proposed projects in the ONAs.

Range-Livestock

The activity plan limits class of livestock in the ONAs to cattle and horses. Grazing sheep and/or goats in the ONAs will not be allowed because of the grizzly bear habitat requirements. The livestock class policy will follow the guidelines recommended by Interagency Grizzly Bear Committee Guidelines, the Grizzly Bear Recovery Plan, and the Rocky Mountain Front Guidelines (also interagency).

[redacted] administrative and livestock operator use of designated vehicle trails will be allowed to monitor rangeland, inspect livestock and to provide maintenance to range improvements or construct range improvements (applies to Blind Horse ONA; Chicken Coulee Allotment and Deep Creek-Battle Creek ONA; East Front Allotment).

A maximum grazing period will not begin prior to July 1 and not extend beyond October 10.

Range developments will not conflict with wildlife habitat objectives or impair the natural area visual character, and will be designed to improve [redacted] resource objectives.

Integrated Pest Management using biological agents including insects will be used when possible.

Moderate livestock grazing use (up to 60%) on suitable rangeland will be allowable. Pasture rotation, season restrictions and herding will be used to obtain moderate utilization levels on ONA allotments.

Cultural

In accordance with federal regulation and BLM policy, cultural resource inventories will be required in advance of all surface disturbing activities. If cultural resources are identified, they must be recorded and evaluated under the criteria of eligibility for the National Register of Historic Places. If cultural resources are found to be eligible, the impacts from surface disturbing activities must be avoided or mitigated. The process of evaluation and determination of effect requires consultation and coordination with the Montana State Historic Preservation Officer and the Advisory Council on Historic Preservation.

Air Quality

Prescribed burns will be done in coordination with the Montana State Airshed Coordinator.

Dust abatement and traffic control requirements may be necessary to minimize particulate matter in the air should any of the "grandfathered" oil and gas leases within the Blind Horse ONA boundaries be developed.

Should any of the "grandfathered" oil and gas leases within the Blind Horse ONA boundaries be developed, venting and flaring of the wells will not be allowed if not economically justified or if in violation of state or federal air quality standards.

Vapor recovery units will be required to reduce noxious odors should oil-gas production facilities be placed adjacent to an ONA boundary.

OIL-GAS AND MINERALS

OIL-GAS

Oil and gas leases will utilize the guidance of the HRMP and the Ear Mountain addition amendment.

Seismic notices will be reviewed on an individual basis and will receive stipulations based on the Rocky Mountain Front Wildlife Guidelines. Valid existing lease rights will be allowed.

LOCATABLE MINERALS

Public lands within the ONAs will remain open to mineral entry per the HRMP. There are no mining claims within the ONAs. Should a claim be staked, a Plan of Operations will be required on all activities (43 CFR 3809.1-4(b)3), except casual use (as defined in 43 CFR 3809.1-2). "Operations" includes all activity associated with exploration, assessment work, development and processing of mineral deposits located under the mining laws.

To ensure adequate rehabilitation, bonding will be required on all operations, except for casual use.

Rehabilitation measures of a disturbed site will consider replacement of wildlife food and cover.

Timing restrictions will be applied to mining operations on an individual basis to accommodate mining operations and to prevent unnecessary and undue degradation while protecting important wildlife habitat.

Mining operators located in crucial wildlife habitat may be required to rehabilitate his previous disturbances prior to initiating new surface disturbing activities. This action will enhance the ability of mining operations to continue while rehabilitating wildlife habitat at the earliest time.

MINERAL MATERIALS

There will be no common variety (saleable) mineral removal allowed within the ONAs. These include sand, gravel and fill material.

LANDS

All BLM-administered land will be retained in federal ownership. Land acquisition will be on a "willing seller basis." ONAs will be avoidance areas for rights-of-way, leases and permits which require development or disturbance. A minimum of one public access will be acquired for each ONA.

No communications site rights-of-way will be allowed within the ONAs.

WATERSHED

BLM will actively and intensively manage livestock grazing to improve vegetative cover throughout the watershed on all ONAs. Use monitoring techniques outlined in Range-Livestock to determine an upward trend in vegetative cover. If improvement is not apparent within two grazing cycles after AMP implementation BLM will consider a different grazing method or exclude livestock by fencing.

BLM will intensively manage the riparian area adjoining the South Fork of Deep Creek to improve streambank vegetation and stability by implementation of an AMP which may include fencing, alternate water development, and other measures.

BLM will continue to actively pursue water rights on all water sources in the ONAs. [redacted]

BLM will ensure that oil and gas activities for valid existing leases as well as any other surface disturbing activities around water sources adhere to state and federal regulations. [redacted]

SOILS

All surface disturbing activities will avoid the Garlet, Loberg, Starman, and Whitore soil series of Upland Woodlands, except for critical locations where trails or roads cross. Water erosion hazard is severe or very severe on these soils, if vegetation is removed, due to their dominantly steep and very steep slopes and relatively thin topsoil.

All land disturbances will avoid wetland sites, riparian communities and areas with slopes exceeding 25% for more than 250 feet in length. Location of these crossings shall be selected by an interdisciplinary team consisting of a wildlife biologist, hydrologist, civil engineer, and soil scientist.

Every attempt shall be made to limit land disturbances in Foothills Grasslands.

NOXIOUS PLANTS

The BLM will implement the Integrated Pest Management (IPM) program to reduce or eradicate noxious plants in the ONAs with emphasis on biological control. Herbicides, mechanical or manual methods could be used under the IPM program along roads, trails, and on small upland infestations to contain or eradicate specific noxious plants on BLM-administered areas. The biological agents approach is the preferred method, however, chemicals or mechanical control efforts may be applied if biological agents are unavailable, or size of infestations (small, isolated) makes biological agents impractical. Biological agents do not include sheep and goats.

FIRE

Wildfires: The U.S. Forest Service will use appropriate suppression action in ONAs and use heavy equipment only when necessary to prevent fire from spreading to adjacent private landowners. Normal suppression techniques would include pumper trucks and hand-line construction crews. Air attacks are permissible [redacted] The initial action agency (USFS) would locate fire camps and associated facilities outside the ONAs.

Prescribed Burns: Specific areas where prescribed burns can improve vegetation condition have yet to be inventoried and prioritized. BLM will complete this step by 1990. Areas where prescribed burning can benefit range condition and wildlife habitat include: (a) Rough fescue and/or Idaho fescue grassland benches where a majority of fescue plants have become "wolfy" with highest priority of burning given to those benches important as bighorn sheep and elk winter range; and (b) decadent aspen groves in need of regeneration for wildlife.

ADMINISTRATIVE ACCESS

The ONAs are closed to all forms of motorized vehicles. Administrative vehicular access will be allowed agency personnel for project and range allotment monitoring, and resource use evaluations [redacted]. This administrative access is restricted to designated roads and trails only. [redacted]

Livestock permittees would be allowed administrative access on a permit basis to administer their livestock lease (to include but not limited to: spring, pipeline, and fence maintenance, salt dispersal, livestock inspection and veterinarian care). This access is limited to designated roads/trails only [redacted] and generally is subject to any stipulations imposed by the agency. Cross-country travel will not be authorized.

Seismic activity conducted by ground-traveling motorized vehicles will be allowed access on a permitted basis, limited to designated roads/trails and subject to stipulations imposed by the agency. Cross-country motorized travel for seismic exploration will not be permitted.

RESOURCE MANAGEMENT PROGRAM

This final AP contains the activity plan. It is within the confines of HRMP direction. BLM is not amending the HRMP with this activity plan.

ACTIVITY PLAN

WILDLIFE and FISHERIES

The RMF is a nationally significant wildlife area recognized for the large numbers of important game species it supports as well as for the critical habitats it provides. Numerous wildlife studies have been undertaken on the RMF, many as a result of the Interagency Rocky Mountain Front Monitoring and Evaluation Program which was initiated in 1980. The summarized data collected and wildlife management guidelines developed were recently published (Rocky Mountain Front Task Force, 1987).

Sound wildlife habitat management along the RMF is the key to maintaining populations of over 3,500 elk, 10,000 mule deer plus smaller populations of whitetailed deer, 1,200 bighorn sheep, and 100 Rocky Mountain goats. Some of these animals use the RMF as year-round habitat, while many are migratory from as far as the Bob Marshall Wilderness and depend on the RMF for winter range. All of these species are a prey base for the endangered gray wolf and the RMF is "designated recovery habitat." The RMF is home to one of the few remaining populations of the threatened grizzly bear (estimated at 90 individuals).

BLM's most important contribution to the security and continued welfare of RMF wildlife is closely tied to the management of the ONAs. Wildlife dependent at least seasonally on these ONAs are shown in Table 15 of Appendix 4. These values have been thoroughly discussed in the HRMP, the Ear Mountain ONA Addition Plan Amendment/EA, and the RMF Task Force Wildlife Guidelines.

A draft Rocky Mountain East Front Wildlife Habitat Management Plan (HMP) (Elliot, W.E., 1980) intended for implementation in fiscal year 1981, was never approved however, some of the wildlife improvement projects listed have been completed and some of the issues have been resolved and wildlife conditions improved. That draft wildlife habitat management plan was superseded by initiation and completion of the HRMP. However, the HMP did identify issues that could be resolved during the RMP process.

The ONAs in question comprise approximately 75% of BLM's public land surface along the RMF, and are where BLM can most effectively manage wildlife and other natural resources.

Livestock grazing systems (especially the East Front allotments) will be actively and intensively managed to improve important wildlife habitats. The grazing management program for each allotment is described in the Range section of this plan description. If substantial improvement in vegetation trend is not apparent within two grazing cycles after AMP implementation, grazing system modification will be made to improve important wildlife habitats, even to the point of excluding cattle by fencing those habitats or water sources that attract livestock. Efforts will be made to design livestock grazing systems to preclude such drastic measures.

Intensive grazing management will continue in the Chicken Coulee allotment. The grazing management program for this allotment is described in the Range section of this plan description. BLM will monitor grizzly bear exclosures.

Access to eastern boundaries of all ONAs will be established to allow walk-in (horses, pedestrian, and non-motorized mountain bikes) hunting so that proper game management could occur (regulated harvest) and so the general public could use the wildlife resource.

Seismic exploration will be allowed in ONAs with strict adherence to the RMF Wildlife Guidelines. BLM will require operators to be especially careful with the use of helicopters (i.e., flight paths, above-ground heights, and 9-mile spacing).

Monitoring of wildlife and range studies and trapping and transplanting of game species will be permitted as described in the Administrative Access section of this plan. Temporary trap facilities will be allowed. Vehicles may be used if necessary for control actions of grizzly bear and gray wolf according to Interagency Agreements within Grizzly Bear and Gray Wolf Recovery Plan goals. Control may include the use of aircraft, i.e. helicopters.

Camping in ONAs will be allowed during any season of the year, but monitored to determine if levels of overnight use will be high enough to develop wildlife problems (e.g., spring grizzly bear habitats or ungulate winter range). If camping levels become detrimental, BLM will reassess policy and restrict camping by season until consequences are acceptable.

The Biological Evaluation/Consultation for the activity plan, per the Endangered Species Act is presented in the Appendix 5.

RECREATION

The visual resource management rating for the ONAs will be upgraded to Class I, except for trailhead sites which will remain Class II. This rating can be assigned to all special areas where the current management situations require maintaining a natural environment essentially unaltered by man. These ONAs possess an "A" scenic quality for all three distance zones and have high visual sensitivity levels.

The VRM Class I applies to areas where the objective is to maintain a landscape setting that appears unaltered by man. The Class II definition was presented in the No Action Plan section of the draft document.

The recreation opportunity spectrum (ROS) classes for the ONAs consists of three categories; semi-primitive non-motorized, semi-primitive motorized, and roaded natural, with the latter being less restrictive. All trailheads will be delineated as "roaded natural."

The HRMP provided the general guidance for ORV management and designations for the ONAs. This AP will provide the specific guidelines and restrictions needed to implement the ORV closure. Refer to Figures 10-13, in Appendix G for ORV designation maps for each ONA. The use of ORVs in closed areas will be allowed for administrative reasons, but this use will be made only with the approval of the Great Falls Resource Area Manager on an individual basis. This motorized administrative use will be restricted to designated routes within the ONAs and includes government employees, livestock permittees, seismic crews, emergency personnel, and state wildlife personnel. No cross-country travel will be permissible.

Camping will be allowed throughout the ONAs, with the exception of the Ear Mountain Trailhead. Camping restrictions on future trailhead sites will be determined on an individual basis after the access is acquired. The ONA will be monitored to see if any conflicts surface between wildlife and campers. If the levels of camping use become high enough to create a problem, seasonal restrictions will be applied. The public should avoid locating campsites in areas that contain delicate plants. They should also select campsites that are well away from streams and trails. If campfires are needed, campers should use fire rings already in place. Use of the "no trace" fire technique will be required in isolated and less popular areas of the ONAs where there are no fire rings.

Recreational camping will be restricted within 200 feet of all springs to protect the water source and to permit wildlife use.

The following recreational development and facilities have been proposed for the ONAs:

ONA boundaries and trailheads will be signed to inform the public of avoidance areas, ORV regulations, noxious plant control efforts, and other essential informational assistance.

The Blind Horse ONA will require a minimum of one trailhead. A unisex toilet will be placed here (VRM Class II restrictions). Recreationists will be required to implement a pack-in/pack-out refuse policy. Picnic tables and fire rings will be provided to accommodate day-use. Trails for hiking, horseback, and mountain bikes may be constructed or maintained and will conform to VRM Class I guidelines.

The Ear Mountain ONA will require a minimum of one trailhead with a 2-acre gravel surface parking area. Two toilets will be placed here. Users will be required to implement a pack-in/pack-out garbage policy. A picnic table, fire rings, and drinking water, if feasible, will be provided to accommodate day-use only. Boundaries and trailheads will be signed. Trails for hiking, horseback and mountain bikes will be provided but must conform to VRM I visual restrictions. BLM will work with USFS on possible trail routes.

The Chute Mountain ONA will require a minimum of one trailhead with a 1-acre gravel surface parking lot. No toilet will be placed here and the garbage policy will be pack-in/pack-out. The area will provide day-use facilities such as tables and fire rings. Trails will conform to VRM Class I guidelines for hiking and horseback.

The Deep Creek-Battle Creek ONA will require a minimum of one trailhead with a 1-2-acre gravel surface parking lot, one unisex toilet, a bear-proof garbage container and picnic tables, fire rings, and drinking water, if feasible, will be provided to accommodate overnight camping. Boundary signs will be placed at strategic locations where people will be expected to enter the area. Trails for hiking and horseback use will be maintained or constructed, conforming to VRM Class I guidelines.

RANGE-LIVESTOCK

BLIND HORSE ONA

Chicken Coulee Allotment

The range management developments in this allotment have been developed over the previous 13 years. The rangeland has shown stabilized (good or better) vegetation and soil conditions. Wildlife habitat for mule deer, elk, bighorn sheep and grizzly bear has benefited from the rest-rotation, improved livestock distribution, spring and riparian protection by exclosures and from better range resources and watershed conditions. Most of the objectives (see Final Headwaters RMP, p. 185) set forth by the cooperative allotment management plan (USFS, BLM, Montana State and private) have been met or partially met. There is the potential to improve rangeland and wildlife habitat conditions under the present plan where studies show an upward trend. The activity plan will continue the present grazing plan in order to reach the full potential of the allotment. Range development that will

improve all resource objectives, does not deteriorate wildlife habitat goals, or impair the natural area visual character is preferred in this plan.

The generic type of range developments depicted in Table 10 could be proposed.

TABLE 10

PROPOSED RANGE DEVELOPMENTS — CHICKEN COULEE ALLOTMENT

Project	Size	Cost	Purpose
Prescribe Burn	100 acres per pasture	$2-4/acre	Reduce shrubby cinquefoil pasture invasion and provide succulent grasses in under utilized areas for mule deer, elk, bighorn sheep, mountain goats and livestock.
Water Spring Development (1)	5 gal. per minute	$500	To distribute livestock utilization, prevent overgrazing and protect riparian habitats.
Water Tank and Pipeline	0.5 mile	$1,500	To distribute livestock utilization, prevent overgrazing and protect riparian habitats.
Integrated Pest Management	Treat with biological or herbicides as needed. No known pests at present.	$50 per acre (herbicide)	To reduce noxious plant infestation.

Management Objectives

The activity plan objectives will remain the same as those in the No Action Plan, but with some rewording and more measureable goals.

Objective 1

Maintain or improve the vigor and density of all species of vegetation which will in turn increase soil stabilization, soil fertility, and water infiltration for improved watershed protection. Measureable objectives:

South Pasture

Maintain Index 90 Excellent Condition (or maintain BLM SSF of 1-20, Stable).

Middle Pasture

Improve Index 73 Good to 81 Excellent in three grazing cycles (or BLM SSF from Moderate 41-60 to Stable 1-20).

North Pasture

Maintain Index 89 Excellent (BLM SSF of 1-20, Stable).

Objective 2

Improve the vigor, reproduction, and forage production of key species, rough fescue and Idaho fescue for balanced livestock production and wildlife habitat requirements. Measureable objectives:

South Pasture

Maintain 12% Fe Id. Maintain 16% Fe Sc.

Middle Pasture

Maintain 25% Fe Id. Increase 3% Fe Sc to 10% in three cycles.

North Pasture

Maintain 15% Fe Id. Increase 6% Fe Sc to 12% in three cycles.

Objective 3

Maintain all primary range in good or better condition (USDA Index 15 and above; BLM Index 51-100).

Objective 4

Riparian enhancement is addressed in the Wildlife and Fisheries section of this plan description.

Objective 5

Maintain slight to moderate utilization over 90% of the suitable rangeland.

Cowtrack Allotment

There is little opportunity for intensive allotment development or grazing systems on this small tract. The activity plan will be to graze, as the current situation, for a brief period in late spring (6/01-6/30), rest during the summer, and graze again in the fall (9/01-11/30).

Management Objectives

Maintain range condition and wildlife habitat condition (Index 51 or above indefinitely).

Livestock use should not exceed 50% (slight to moderate) over 90% of the suitable livestock range in order to maintain the winter wildlife habitat.

If wildlife winter range carrying capacity cannot be maintained as outlined in the objectives, then a proposal will be made to graze livestock only in alternate years or the federal land will be protected completely from livestock grazing by fencing the federal land boundary. This proposal should be determined by 1993, or in 5 years to take in consideration and average the abnormal weather and drought years which influence monitoring.

EAR MOUNTAIN ONA

McCarthy Individual Allotment

The McCarthy allotment will continue to be managed as a custodial allotment as in the current situation.

No additional range developments will be proposed (see objectives).

Management Objectives

Objectives of custodial management will be to graze light to moderate (below 60% utilization) and to prevent or control noxious plant infestation. Integrated Pest Management (IPM) use with biological agents (insects) will be used in the Teton River bottom. Herbicides may be used to prevent short-term spreading of spotted knapweed.

Ear Mountain Allotment

The Ear Mountain allotment will remain in the Maintain category. The most cost effective proposal to maintain or improve the resources is to continue the current situation management in consideration of the allotments mostly good or better range condition and low impact level of horse or grazing use and season.

No range improvements are proposed. Water and fencing are adequate to meet the objectives.

Management Objectives

There is a lack of range resource data necessary to propose accurate and measurable objectives. In general terms, the objectives proposed are to:

Maintain or improve the good condition (Index 51 Ecological Site Method) range. Improve the fair condition range (Index 21-50) to good or excellent in 10 years.

Inventory the rangeland with the "ecological site method" to provide baseline data and begin monitoring transects by 1990.

Ear Mountain Tract

The Ear Mountain tract is unleased for grazing and represents 550.2 acres of unsuitable lands surrounding and including Ear Mountain Peak. This tract is reserved by District Manager's decision (November 4, 1977) for land and forage needed for threatened and endangered species protection and bighorn sheep, mountain goat, and mule deer winter/spring forage (see Table 2 for legal description, and Appendix 2, Figure 7).

CHUTE MOUNTAIN ONA

East Front Allotment

One of the three preliminary pastures outlined in the Deep Creek-Battle Creek ONA for the East Front allotment is in the Chute Mountain ONA. This north pasture will be called Edwards Creek pasture and will be established after the 2½ mile federal land boundary line is fenced. The pasture will be totally BLM-administered with the Lewis and Clark National Forest as a boundary on the west. The narrative on carrying capacity, resources, activity plan objectives, monitoring and proposed range improvements is given in the following allotment discussion.

DEEP CREEK-BATTLE CREEK ONA

East Front Allotment

This allotment has high potential to respond to livestock management. As noted in Appendix E of the Final Headwaters RMP (p. 185), forage utilization by livestock is poorly distributed, resulting in over-utilization and poor range conditions in some areas. There is opportunity to improve riparian habitat for wildlife, spring-winter mule deer and sheep range and to improve watershed conditions. All of these objectives can be met, if the vegetation on at least parts of the federal lands is allowed to reach full maturity or seed ripe each year. The best method to accomplish this is to fence across (east-west) the ONA to make pastures manageable so that one or more pastures are not grazed during the spring period (no grazing June 15-July 15). The result of this treatment will be improved plant condition, vigor and reproductiveness. Livestock, wildlife and watershed conditions will improve because spring plant rest is beneficial to all the vegetation that those resources depend on.

A three-pasture, deferred rotation grazing system will be used to accomplish the above objectives. Two pastures will be created in the Deep Creek-Battle Creek ONA while a third will be in the Chute Mountain ONA.

The reduction in federal AUMs implemented by the proposed decision may be ineffective in actually reducing livestock numbers if the livestock operator continues to graze the same number of cattle on adjacent private land. Private lands are mixed with BLM public lands in the pasture and an agreement to limit livestock numbers has not been reached. BLM will actively pursue the implementation of an AMP to resolve this issue.

The preliminary size in acres and capacity of these pastures is shown in Table 11.

TABLE 11

PASTURE ACRES/CAPACITY (AUMs)

	BLM	Private	USFS	Total
Battle Creek Pasture (South)	1,348/90	1,855/208	60/10	3,238/308
Deep Creek (Middle)*	1,140/160	3,050/408	—	4,370/568
Edwards Creek (North) (Chute Mountain ONA)	2,290/192	0	—	2,290/192
Totals	4,778/442	4,905/616	60/10	9,898/1,068

Private AUMS are based on preliminary estimates using 7-9 acre per AUM average.

*This pasture could be divided to add a fourth pasture. The size or number of pastures for the deferred-rotation system has not been determined but could include 3-4 pastures. Grazing in the early pasture would begin July 1 and end October 15. This proposed season would allow 3½ months use for 305 cattle.

Table 12 shows the proposed range developments on the East Front allotment.

TABLE 12

PROPOSED RANGE DEVELOPMENTS — EAST FRONT ALLOTMENT

Project	Size	Cost Estimate	Purpose
Fencing (4-wire, steel post & wood jackleg)	4 miles BLM 2.0 miles Private	$10,000 $5,000	To distribute livestock, control season of use.
Spring Development	5 gal. per min.	$2,000	Distribute livestock, prevent overgrazing, protect riparian habitat.
Water, tanks, & pipelines	1.5 miles, 6 tanks	$3,000	Distribute livestock, prevent overgrazing, protect riparian habitat.
Prescribe Burn	Unknown	$2-4/acre	Reduce shrubby cinquefoil, provide succulent grasses & forbs in underutilized areas for mule deer, elk, big horn sheep, goats and livestock.
Integrated Pest Management	Treat with biological or chemical as need occurs-none known at present.	$50/acre (herbicide)	To reduce noxious plant infestation.

Management Objectives

Improve the range condition from poor (Index 23.6) to good (Index 51) or better as read on transect 2001 in 15 years. Establish a transect and similar objectives for the south (Battle Creek) pasture.

Improve the soil stability and watershed condition by monitoring the Soil Surface Factors (SSF) by range sites within each pasture and to reduce SSF to 20 or less (slight to stable) in 10 years on key range sites.

Improve livestock distribution so that light to moderate utilization (20 To 50%) will occur on 30 to 90% of the allotment in 5 years.

The grazing system will be modified or cattle removed from the allotment if after two grazing cycles substantial progress in achieving the above three objectives is not made.

Green Timber Allotment

There are few opportunities in this allotment to develop range improvements or rotate livestock in a pasture system in this ONA. The management objective will be to maintain the range condition, (1980 Site-Vegetation Inventory shows good to excellent condition) the high value wildlife habitat, and watershed conditions by improving the livestock distribution. The goal will be to achieve moderate use (50%) of the federal lands after the critical spring growth period (i.e. after July).

The preferred method with the least cost will be to graze the federal lands after July 1, with approximately 35 cattle for a 3-week period. To accomplish this the operator will herd 35 cattle by horse after July 1 for 3 weeks. The operators could pick a later 3-week period (i.e., late July to August or August to September), but will not use the federal land before July 1, or after October 15. The operator will be required to remove the cattle from the federal land pasture after the 3-week period to avoid using more than 50% of the available forage.

No range improvements will be proposed. Integrated Pest Management (IPM) using herbicides and biological agents will be used to control noxious plants infestations such as spotted knapweed. Spotted knapweed has not been found on the Green Timber allotment federal lands at this time.

Most of the opportunities for improved management occur on private land and thus reduce BLM's opportunity to invest in rangeland improvements. The alternatives for allotment management planning are limited for this reason.

Management Objectives:

Maintain or improve the range condition in good (Index 51) or better condition and establish a permanent transect to monitor this objective.

Maintain or improve the stable to slight soil surface factor at an Index 20 or less.

Obtain livestock forage utilization that is moderate (50-60%) on the key range sites.

CULTURAL AND HISTORIC

No major issues directly apply to cultural resource management in the ONAs. However, the issues of public access, seismic exploration, range improvements, and recreation developments may indirectly affect archeological (and rarely historical) sites through surface disturbing activities such as roads, seismic lines, spring developments, parking facilities and hiking trails.

Caution should be used in planning major surface disturbing projects (road or parking facility) in the canyons and stream bottoms, especially at the point where they emerge from steep terrain. These sensitive areas include Battle Creek and the South Fork of Deep Creek in the Deep Creek-Battle Creek ONA; the North Fork of Deep Creek in the Chute Mountain ONA; the North and South Forks of Willow Creek in the Ear Mountain ONA, and the two forks of Muddy Creek in the Blind Horse ONA. Several of these areas will undoubtedly contain prehistoric aboriginal campsites which may be eligible for the National Register. Minor projects, such as spring developments, hiking trails, and seismic lines could normally be planned to avoid cultural resources in these areas. The summits of Ear Mountain, Chute Mountain and lesser prominences, including escarpments, should be avoided by all projects if an inventory reveals that a prehistoric or historical aboriginal religious site (vision quest structure) is present.

Cultural resource inventories will be conducted prior to approving a surface disturbing project. Identified sites will be recorded and evaluated in consultation with the Montana State Historical Preservation Office (SHPO). If determined to be eligible for the National Register, they will be avoided or mitigated (salvaged).

AIR QUALITY

The four ONAs are in a Class II airshed, defined as moderately impacted by pollutants, and are near a mandatory Class I area (the Bob Marshall Wilderness).

Projects contributing to a decline in air quality will require more stringent stipulations. Oil and gas production facilities adjacent to the ONAs may require vapor recovery units to contain noxious gases, such as those associated with hydrogen sulfide.

Prescribed burns may degrade air quality. Pollutants produced by this action are expected to be dispersed by the strong winds in the area, and all burns will be coordinated with the State Airshed Coordinator.

Projects contributing to a decline in air quality will require more stringent stipulations. The State of Montana, Air Quality Bureau, standard for ambient H^2S level is .05 parts per million (ppm) per hour, not to be exceeded more than once per year. The standard for ambient SO^2 level is .10 ppm per 24-hour average, not to be exceeded more than once per year. The BLM agrees that this is a reasonable threshold value for noxious odor control in the vicinity of the RMF ONAs. Present ambient concentrations in the vicinity of existing production facilities are well within these thresholds. Oil and gas companies proposing production facilities will be required to submit a plan to meet these threshold values.

There are several oil-gas leases held by production, or suspended within the Blind Horse ONA. Should any development occur on these leases, venting and flaring of the wells will not be allowed if not economically justified or if in violation of state or federal air quality standards.

Intense dust abatement (road watering, use of resin road surfaces, etc.) on road surfaces and traffic control requirements may be required to maintain the Class II air quality standards.

OIL-GAS AND MINERALS

OIL-GAS

Oil and gas leasing will continue as indicated in the HRMP. Leases that expire that are greater than 1/4-mile inside the NSO boundary as shown in the HRMP will not be reoffered. Those leases that are 1/4-mile or less inside the NSO boundary will be reviewed and reoffered with NSO stipulations (refer to Table 13 and Appendix 3, Figures 14-21).

TABLE 13

ACTIVITY PLAN
OIL AND GAS DEVELOPMENT

	Blind Horse	Ear Mountain	Chute Mountain	Deep Creek/ Battle Creek
Total Acres	4927	1869	3205	3086
Acres to be Leased with NSO	2368	646	1305	2729
Acres not to be Leased	2559	1223	1900	357

The NSO stipulation has been attached to the 1/4-mile-wide borders of the ONAs according to the HRMP. BLM could have designated all of the ONAs as NSO in consideration of resource values. However, based on the premise that oil-gas resources over 1/2-mile from a drillsite probably cannot be drained, the BLM felt it was prudent to not lease those areas greater than 1/4-mile from where a location could be constructed, thereby not leasing an area a lease holder could not develop. When the HRMP is updated or amended, there is the possibility that advances in drilling and exploration technology may allow some of the ONA No Lease portions to be leased with NSO stipulations without degrading the outstanding resources, values, and natural characteristics of the ONAs. Valid existing lease rights in the Blind Horse ONA allow for roads and pipeline construction within the ONA to allow oil and gas exploration and development. Oil and gas pipelines and related powerlines will be routed to avoid ONAs, except where the route chosen to avoid crossing other public or private land will cause more impacts.

Oil and gas activities in or adjacent to the ONAs may produce H^2S gas. The best technology practices, including an H^2S contingency plan, will be followed should gas production occur.

Seismic Exploration

Seismic stipulations will be developed and reviewed on an individual basis utilizing the RMF Wildlife Guidelines, the HRMP and this AP.

Under this plan, motorized seismic exploration will only be allowed on designated roads and trails. No motorized, cross-country seismic exploration will be authorized. Non-motorized, seismic exploration (helicopters, backpacks) will be allowed throughout the ONAs, in compliance with the RMF Guidelines and the HRMP. No new road construction will be authorized.

Coal

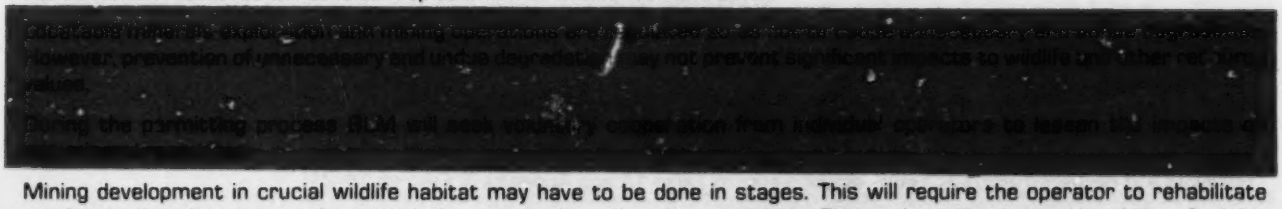
There is no known coal resource within the ONAs.

Minerals—Locatable

Public lands within the ONAs will remain open to mineral entry according to the HRMP. There are no mining claims within the ONAs. Should a claim be staked, a Plan of Operations will be required on all activities (43 CFR 3809.1-4(b)3), except casual use, as defined in 43 CFR 3809.1-2. "Casual use operations are those that cause negligible surface disturbance and that do not use explosives or mechanized earthmoving equipment in areas closed to ORV use. The operator is not required to contact the BLM prior to or after conducting casual use operations, but must take all steps necessary to prevent unnecessary or undue degradation." "Operations" includes all activity associated with exploration, assessment work, development and processing of mineral deposits located under the mining laws.

To ensure adequate rehabilitation, bonding will be required on all operations, except for casual use.

Rehabilitation measures will consider replacement of wildlife food and cover.



Mining development in crucial wildlife habitat may have to be done in stages. This will require the operator to rehabilitate previously disturbed areas prior to initiating new surface disturbing activities. This action will enhance the ability of mining operations to continue while rehabilitating critical wildlife habitat at the earliest possible opportunity.

MINERALS—SALEABLE

There will be no removal of common variety saleable minerals (sand, gravel, rock) within the ONAs.

LANDS—ACCESS

WATERSHED

The best method to maintain or improve water quality and quantity is to improve vegetative cover. Vegetative cover could be improved in several areas throughout the watershed (see the Range section of this plan description).

The method for improving the vegetative cover should be an increased level of livestock grazing management. Common techniques include fencing, water developments, and various grazing methods (see the Range section of this plan description).

All vegetative increases will go to watershed and wildlife. BLM will stabilize livestock allocations at current levels, unless monitoring indicates short-term reductions are needed to rehabilitate abused areas.

This plan will manage the riparian area adjoining the South Fork of Deep Creek in the Deep Creek-Battle Creek ONA to improve vegetation, streambank stability, and reduce the total sediment load. The result will be protection and enhancement of the existing fishery and improved shallow groundwater storage.

Oil and gas activities will dispose of drilling fluids, produced water, and other waste products in accordance with state and federal laws.

BLM will claim water rights on all water sources on public lands within the ONAs. Coheld claims may be agreed to in special situations such as the permittee contributing significant funding on stock watering facilities. If a coheld claim is enacted, the permittee must agree to a stipulation releasing his portion of the claim to BLM if he relinquishes his grazing permit. The permittee will be compensated for his contribution in the project.

SOILS

Soil trampling and erosion will be reduced by controlling season-of-use and degree of use by livestock as intensive grazing methods are implemented on all ONA allotments. More precipitation will soak into the soil as vegetation ground cover increases, resulting in more vegetation production in riparian zones. The vegetation increase will reduce soil erosion along stream banks and drainage ways.

NOXIOUS PLANTS

Noxious plants are a threat throughout the RMF and can cause a variety of ecological, social and economic impacts. These plants have a variety of adverse affects on public and private resources: suppression of native plants; reduction of environmental quality; degradation and loss of wildlife habitats and supporting populations; and reducing economic benefits.

The BLM will implement the Integrated Pest Management (IPM) program to reduce or eradicate noxious plants in the ONAs with emphasis on biological control. Herbicides, mechanical or manual methods could be used under the IPM program along roads, trails, and on small upland infestations to contain or eradicate specific noxious plants on BLM-administered areas. The biological agents approach will be the preferred method, however, chemicals or mechanical control efforts may be applied if biological agents are unavailable, or the size of infestations (small, isolated) makes biological agents impractical.

Biological control is the use of natural plant parasites to reduce noxious plant densities to tolerable levels in grasslands, riparian areas or woodlands. Biological control agents will be used as the major noxious plants control mechanism on the ONAs.

Biological control, when specific plant species agents are available, is superior to chemical control for these reasons: environmentally advantageous; existing beneficial insect populations are preserved; no impact on water quality; no toxic residues; control is specific to target plants; no safety periods to observe; prolonged action requires fewer applications; no effect on wildlife; no human risk, and lower program costs.

The negative factors of chemical treatment include: human health risk; high annual costs; wildlife and fisheries damages and loss; water quality degradation, and considerable public opposition to their use.

The Lewistown District, BLM Noxious Plants Control/Eradication Program and Policy for the ONAs is in compliance with the Northwest Area Noxious Weed Control Program Final Environmental Impact Statement, December 1985, as supplemented April 1987, and the Montana (BLM) Noxious Weed Control Program Record of Decision, May 5, 1987.

FIRE

Wildfires: The U.S. Forest Service will use appropriate suppression action in ONAs and use heavy equipment only when necessary to prevent fire from spreading to adjacent private landowners. Normal suppression techniques will include pumper trucks and hand-line construction crews. Air attacks are permissible in initial attack to prevent fires from spreading to adjacent private lands. The initial action agency (USFS) will locate fire camps and associated facilities outside the ONAs.

Prescribed Burns: Specific areas where prescribed burns can improve vegetation condition have yet to be inventoried and prioritized, but this will be completed by 1990. Areas where prescribed burning can benefit range condition and wildlife habitat include: rough fescue and/or Idaho fescue grassland benches where a majority of fescue plants have become "wolfy" with the highest priority of burning given to those benches important as bighorn sheep and elk winter range; and decadent aspen groves in need of regeneration for wildlife.

Modified suppression techniques and prescribed burns can improve vegetation vigor and increased ground cover for soil and watershed stability.

These techniques can change vegetation by reducing decadent plant growth which will improve plant vigor and density; and by changing composition of the present species of grasses, forbs, and shrubs.

Fuel management would be treated on a site-by-site basis.

ADMINISTRATIVE ACCESS

The ONAs are closed to all forms of motorized vehicles. However, administrative vehicular access will be allowed agency personnel for project and range allotment monitoring, resource use evaluations [redacted] administrative access to designated roads and trails, [redacted]

Livestock permittees will be allowed administrative access on a permit basis to administer their livestock lease (including but not limited to spring, fence, and pipeline maintenance, salt dispersal, livestock inspection and veterinarian care). This access is limited to existing roads/trails only [redacted] and is subject to any stipulations imposed by the agency. Cross-country travel will not be authorized.

Seismic activity, conducted by ground-traveling motorized vehicles, will be allowed access on a permitted basis, limited to designated roads/trails and subject to stipulations imposed by the agency. Cross-country motorized travel for seismic exploration will not be permitted.

This activity plan will be amended to reflect a more restrictive motorized administrative access policy should monitoring indicate this form of access is negatively impacting the ONA values.

Please refer to Appendix 6 for ONA maps depicting the administrative access routes, restrictions, and conditions.

Management Direction Summary

The policy statements and management direction given in this activity plan are summarized in the Activity Plan Policy Statements and Management Direction sections.

Supplemental resource information and specific public participation and coordination information is given at the conclusion of the Appendix section.

MONITORING AND EVALUATION SECTION

The purpose of this section is to clearly establish an operational process for monitoring and evaluating each resource to ensure that what was proposed is happening and within technical limits. The results of these data collection processes are essential to the budget process which will result in the finances necessary to accomplish programs and projects.

ACTIVITY PLAN

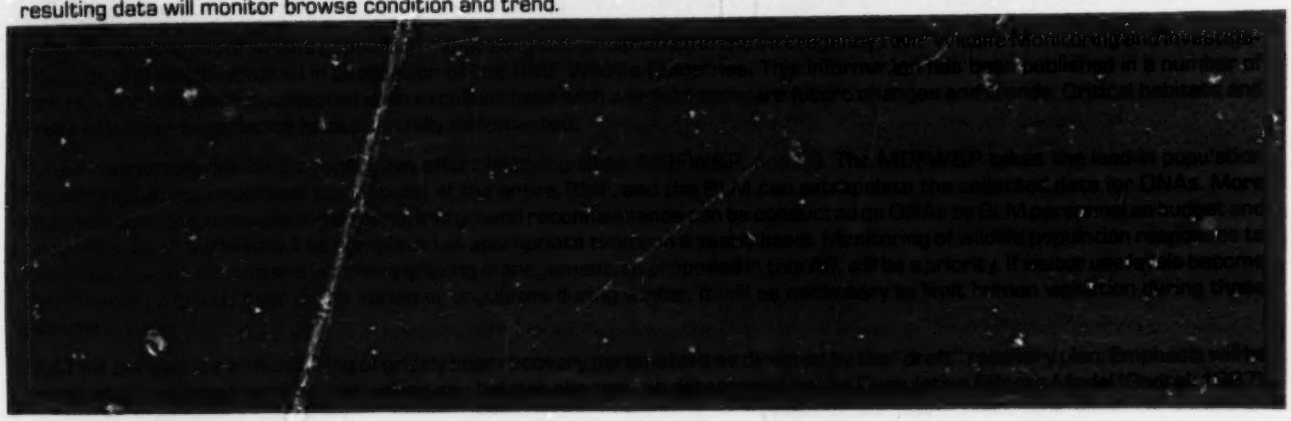
Wildlife and Fisheries

Big Game Habitat Analysis

Results of trend monitoring, as proposed in the Range section of this plan, will yield analysis concerning trends in wildlife habitat condition. Duplication of effort should be avoided when monitoring this plan, therefore coordination between the wildlife and range program will be a primary goal of this monitoring program. Vegetation (habitat) studies proposed in addition to those given in the range section will include:

Continue monitoring the Pamburn and Blind Horse exclosures in the Chicken Coulee allotment by the "woody riparian trend transect", (Myers, L.H., 1987). Exclosures will be monitored at a minimum of 2-year intervals.

Selected sites on critically important deer winter ranges of creeping juniper habitat will be monitored by the Canfield (1941) line interception and Daubenmire (1959) methods at three transect locations. At least two transects on the East Front and Chicken Coulee allotments should be established which would monitor conditions on deer winter range encompassing all ONAs. The resulting data will monitor browse condition and trend.



Recreation

The criteria for each ROS class in the ONAs will be evaluated every 5 years. If any change in acreage of these ROS classes occurs, BLM will determine whether to amend the AP or call it plan maintenance.

The ORV use will be monitored to ensure that ORV users comply with the closed designation. Actual violations of the closure, plus resource degradation, user conflicts, or user safety will be the measurements (indicators) evaluated. The ONAs will be checked on a monthly basis during the fall hunting season and at least once each during the spring and summer periods.

Although no developed recreation sites currently exist, the 12.75-acre parcel near Ear Mountain along the South Fork of the Teton River has been designated for multiple-use which includes a trailhead site. No overnight camping is allowed here and the area will be monitored at least three times during the year.

Signs and ORV barriers will be monitored early each summer for maintenance and possible replacement needs. Form 9130-4 will be used to record the necessary sign data.

The internal trail system will be monitored annually to assess the impact of visitor use, to document deteriorating conditions of trails, if any, and to determine the necessary repair and construction work needed to maintain the network in a safe condition for the visitor.

Range-Livestock

BLIND HORSE ONA

Chicken Coulee Allotment

Monitoring range condition and trend will continue by USFS contract in each pasture every 4 years, or by BLM each year in the rest-treatment pasture. Utilization, climate and actual use data will be recorded every year. The ecological site method (Daubenmire transect) will be used by the BLM to record vegetation cover and composition data. Allotment evaluations will occur every cycle (4 years).

Cowtrack Allotment

Wildlife values, especially winter—spring habitat for bighorn sheep and mule deer, are most significant and will be monitored to prevent conflict between custodial livestock grazing and the need for residual wildlife vegetation. A range condition and trend Daubenmire transect is to be read every 2 years. Utilization monitoring to measure livestock use and residual vegetation for wintering wildlife will be read every year.

EAR MOUNTAIN ONA

McCarthy Individual Allotment

Monitoring of range condition, trend and utilization will continue on a 10-year custodial level basis.

Ear Mountain Allotment

A 5-year schedule for monitoring range condition, trend, and utilization will continue, and will require a yearly actual use report from the operator.

DEEP CREEK-BATTLE CREEK ONA

East Front Allotment

A minimum of one range condition and trend transect per pasture will be established and read once per grazing cycle (3-4 years). Utilization will be read in each pasture every year. Actual use reports will be secured from the operator every year. Climate will be recorded every year. An Activity Plan evaluation will be made at the end of each grazing cycle.

Green Timber Allotment

Livestock herding plan monitoring is important to the success of achieving the objectives. The operator will record the dates and numbers of livestock herded onto the federal pasture in an actual use report each year. There may be some stray livestock that move into the uplands without herding, but the number is not expected to be significant because the cattle move to the lower elevations. Utilization will be recorded each year and range condition and trend will be recorded every 4 years to monitor the success of this system. Climate data such as precipitation and temperature from the Gibson Dam station will also be taken. Evaluations will occur after each 4-year trend study.

Cultural

Any significant cultural resources identified in future inventories will be periodically inspected (at least every second year) to determine if impacts are occurring from erosion or artifact collecting. Should such impacts occur, controls may be required (trail route modification, area closure) or the sites may require mitigation or stabilization.

Monitoring will only occur if a significant site is identified and impacts occur.

Lands

The access acquisition plan will be reviewed every 5 years for compliance, review and updating. The first review of the access acquisition will occur in 1993.

Watershed

Vegetative monitoring results obtained by range and wildlife will be used to evaluate watershed condition. Water monitoring will be done only in emergency situations such as fish kills, oil and gas spills, etc. that require short-term, high-intensity monitoring.

Air Quality

Air quality evaluation by air sampling stations will be done as the need arises (e.g., oil-gas developments).

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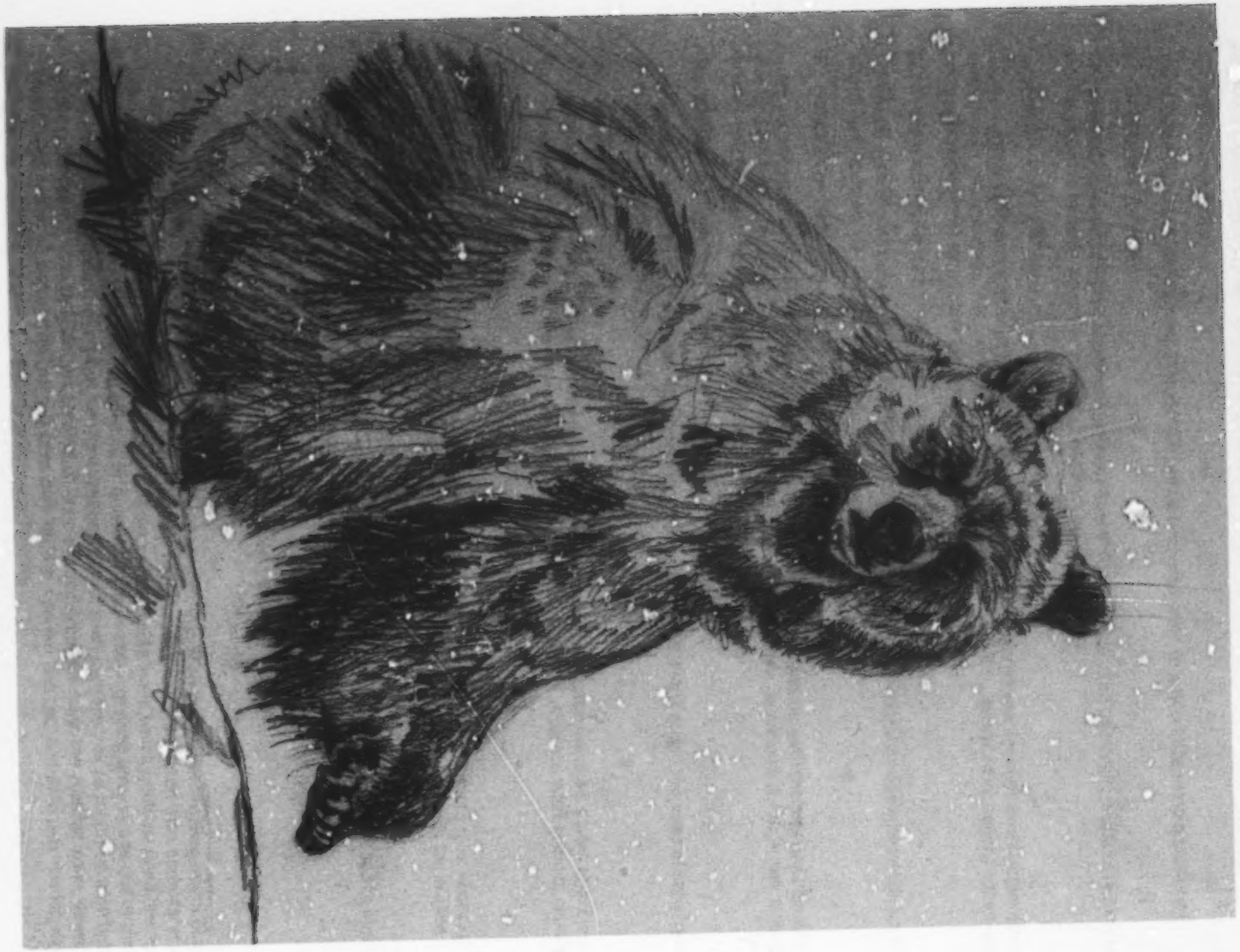


APPENDIX

Appendix 1: HEADWATERS RMP POLICY AND DIRECTION

The Headwaters RMP/EIS derived resources management direction which will be followed by all relative resources in the development and execution of the plan.

1. Wildlife and Fisheries:

Wildlife reintroductions and fish stocking proposals will be evaluated and recommendations will be made to the Montana Department of Fish, Wildlife, and Parks (MDFW&P).

2. Wildlife and Fisheries:

A Wildlife Habitat Management Plan (HMP) will be prepared prior to any wildlife reintroductions.

3. Wildlife and Fisheries:

HMPs or Coordinated Resource Management Plans (CRMP) will be used to identify projects necessary to stabilize and/or improve unsatisfactory or declining wildlife habitat condition.

4. Wildlife and Fisheries:

No activities will be permitted in habitat for threatened and endangered species that would jeopardize the continued existence of such species. Management activities in T/E habitat will be designed to benefit those species through habitat improvement as per the Endangered Species Act (ESA).

5. Wildlife and Fisheries:

The U.S. Fish and Wildlife Service (USFWS) and MDFW&P will be consulted prior to implementing projects that may affect T/E species. Per the ESA.

6. Wildlife and Fisheries:

Management actions within occupied grizzly bear habitat will be consistent with the goal and objectives contained in the Grizzly Bear Recovery Plan (USDI, FW 1982) and the guidelines developed through the Interagency Wildlife Monitoring Program for mineral exploration and development.

7. Wildlife and Fisheries:

Animal damage control programs will be coordinated with the U.S. FWS, and in the case of aerial gunning requests, with Montana Department of Agriculture.

8. Wildlife and Fisheries:

Fish and wildlife habitat will continue to be evaluated on a case-by-case basis as a part of project level planning. Stipulations will be attached as appropriate to assure compatibility of projects with critical, crucial and essential habitat.

9. Wildlife and Fisheries:

Water developments will not be established for livestock where significant conflicts over vegetation would result. Water will be provided in allotments (including rested pastures) during seasonal periods for wildlife.

10. Wildlife and Fisheries:

Vegetative manipulation projects will be designed to minimize impact on wildlife habitat and to improve it whenever possible. Consult with MDFW&P in advance of all vegetative manipulation projects.

11. Wildlife and Fisheries:

Sufficient forage and cover will be provided for wildlife seasonal habitat.

12. Wildlife and Fisheries:

Wildlife forage and cover requirements will be incorporated in livestock allotment management plans (AMP) and will be specific to areas of primary wildlife use. Riparian habitat needs will be taken into consideration in developing livestock grazing systems and pasture designs. Some of the techniques which could be used are: changing class of stock; either eliminating hot season grazing or scheduling hot season grazing for only one out of three years; salting away from riparian areas; laying-out pasture fences so that each pasture has as much riparian habitat as possible; locating fences so that they do not confine or concentrate livestock near the riparian zone; developing alternative sources of water to lessen the grazing pressure on the riparian habitat; and as a last resort, excluding livestock completely from the riparian habitat by protective fencing.

13. Wildlife and Fisheries:

Range (livestock) improvement will be designed to achieve both wildlife and range objectives. Existing fences may be modified and new fences will be built so as to allow wildlife passage. Modify fences which do not allow for wildlife passage.

14. Recreation—Visual Resources:

At a minimum, Class II VRM guidelines will be applied on the ONAs. Visual resources will continue to be evaluated as a part of activity and project planning; stipulations will be attached as appropriate to assure the compatibility of projects with management objectives for visual resources.

15. Recreation—Motorcycle Use Areas:

Federal (BLM-administered) land along the Rocky Mountain Front Range ONAs is not available for motorcycle events.

16. Recreation—Travel Planning and Motorized Vehicle Use:

The ONAs are closed to motorized vehicle use.

17. Recreation:

Investment of public funds for new recreation developments will be permitted only on lands identified for retention in public ownership.

18. Range (Livestock):

AMPs will be written to analyze actions which affect the environment and alternatives to those actions and mitigate adverse impacts. All allotments in which range improvement funds are to be spent will be subjected to an economic analysis.

19. Cultural Resources:

Cultural resources will be inventoried and evaluated as part of project planning in compliance with EO 11593 and Section 106 of the National Historic Preservation Act of 1966, as amended; stipulations will be attached as appropriate to assure compatibility of projects with proposed management objectives for cultural resources.

20. Oil and Gas:

Seasonal stipulations on oil and gas exploration and/or production will be required in bighorn sheep, elk, and mule deer winter/spring range and mountain goat kidding areas.

No surface occupancy will be permitted on new leases in the ONAs.

As described in the HRMP, no leasing will be permitted in the core of the NSO areas.

21. Minerals—Saleable:

Applications for removal of common variety mineral materials will continue to be processed on a case-by-case basis.

Stipulations to protect important surface values will be attached based on interdisciplinary review of each proposal.

22. Minerals—Locatable:

All federal land will remain open to mineral entry and development unless previously withdrawn. Locatable mineral exploration and development will be regulated under 43 CFR 3809.

23. Lands:

Federal land within the retention areas (four ONAs) will remain in public ownership.

24. Lands-Utility/Transportation Corridor:

Public lands along the Rocky Mountain Front (ONAs) are to be managed as avoidance areas (areas generally not available for utility or transportation corridor development). Exceptions may be permitted based on consideration of the following criteria: type of and need for facility proposed; conflicts with other resource values and uses, including potential values and uses; and availability of alternatives and/or mitigation measures.

25. Water:

Water quality will be maintained or improved in accordance with state and federal standards. BLM will consult with state agencies on proposed projects that may significantly affect water quality. Management actions on public land within municipal watersheds will be designed to protect water quality and quantity. Management activities in riparian zones will be designed to maintain or improve riparian habitat condition.

26. Water:

Authorized improvements will avoid riparian zones. Water resources will be evaluated on a case-by-case basis as a part of project planning. Stipulations will be attached, as necessary.

27. Forestry:

Public land in the four ONAs is set aside from forest management.

28. Fire:

Continue to provide control during the first burning period of all wildfires on or threatening public land until the 1978 Normal Fire Year Plan is updated. Then modified suppression areas may be established based on the following criteria: values at risk; fire behavior; fire occurrence; beneficial fire effects; fire suppression costs and consistency with other agency plans and policies.

Prescribed burning will be used in support of resource management objectives.

Appendix 2: LIVESTOCK LEASES AND IMPROVEMENT PROJECTS

Blind Horse
Outstanding Natural Area

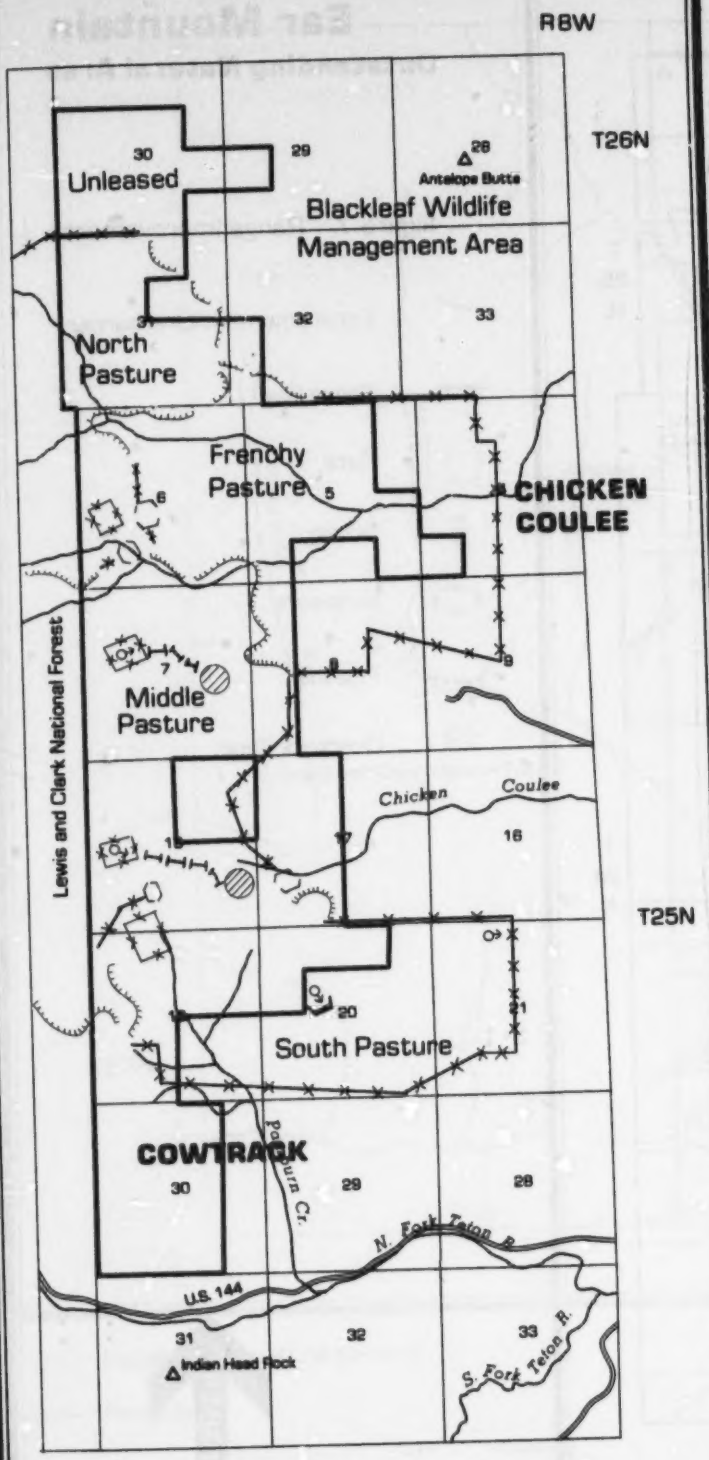


Figure 6. Range Improvements

- Escarpment (natural barrier)
- Fence line
- Gate
- Spring
- Exclosure
- Pipeline
- Livestock Tank

NORTH

0 1 2 Miles
0 1 2 3 Kilometers

1:63,360

Ear Mountain
Outstanding Natural Area

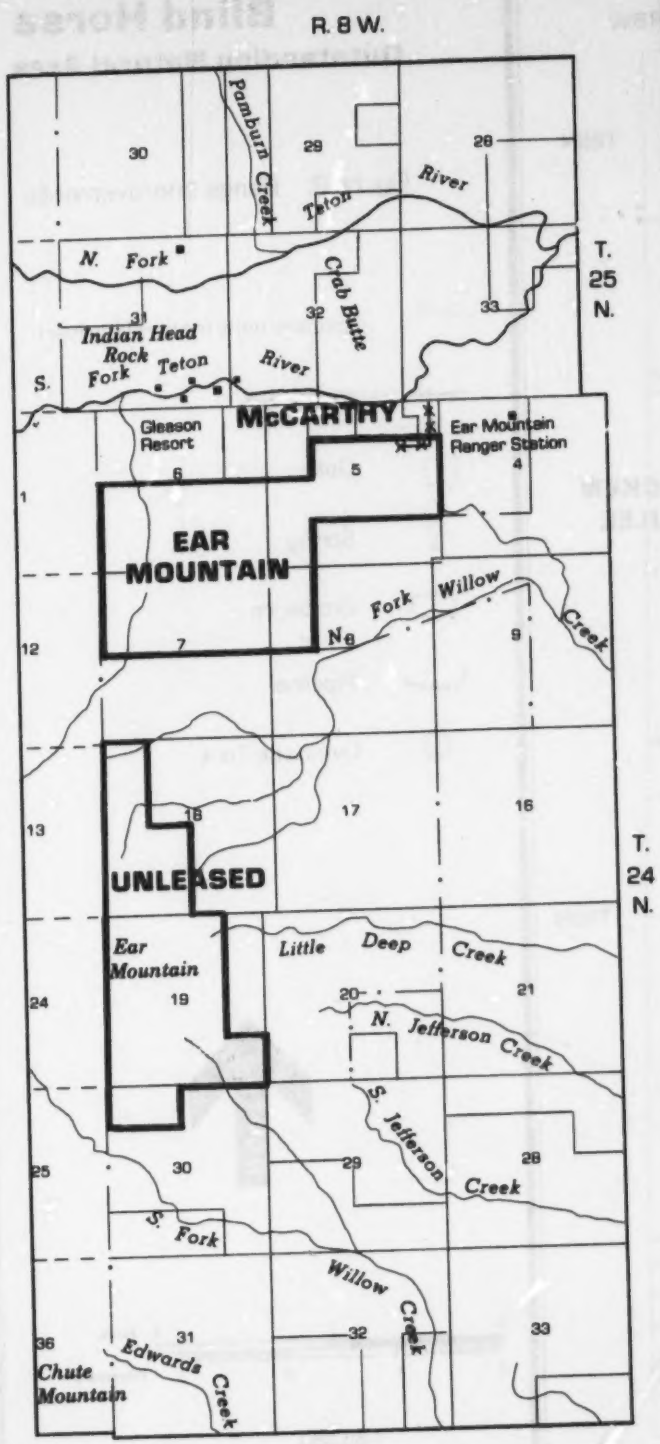


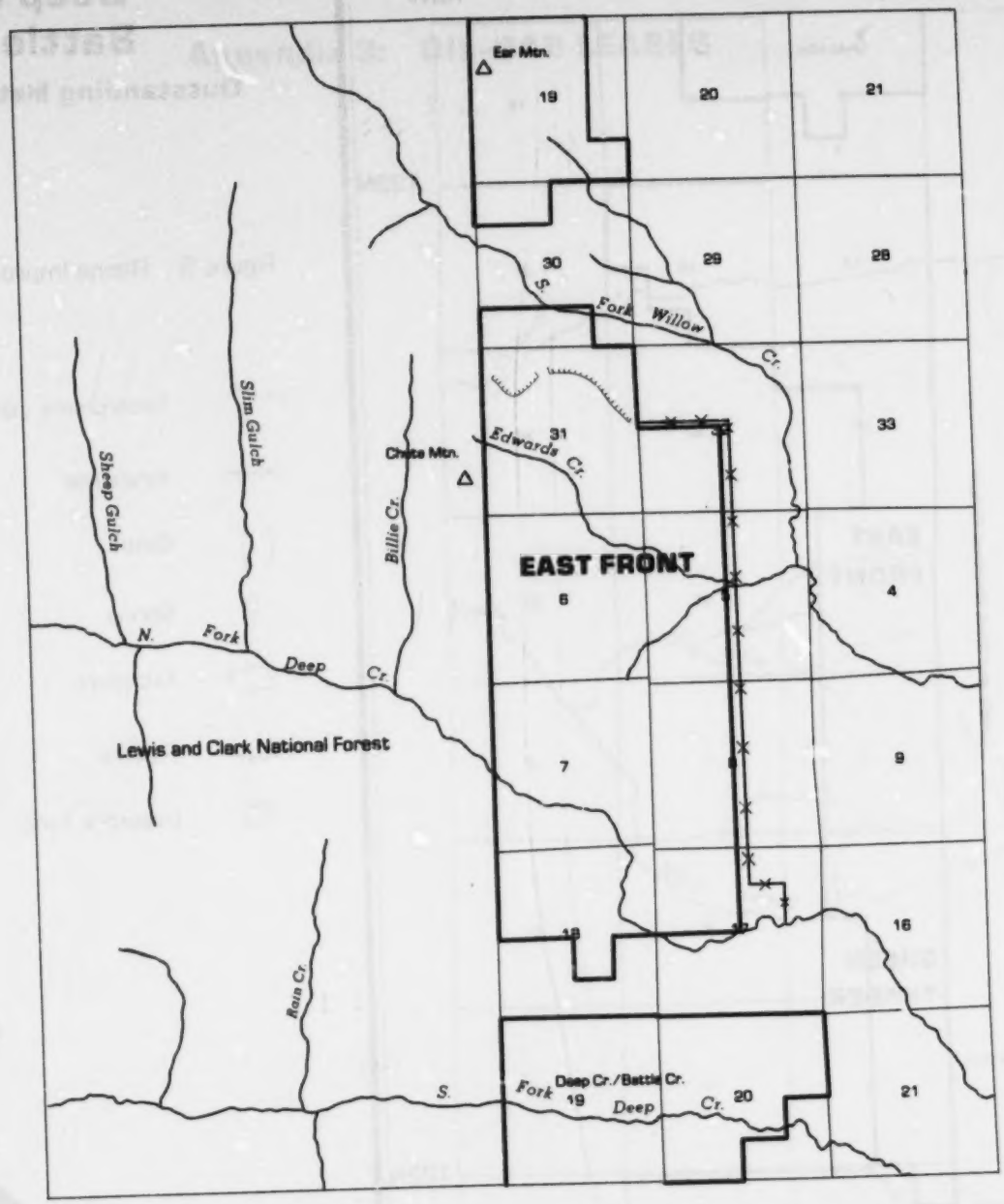
Figure 7. Range Improvements

- Escarpment (natural barrier)
- Fence line
- Gate
- Spring
- Exclosure
- Pipeline
- Livestock Tank

NORTH

0 1 2 Miles

0 1 2 3 Kilometers



Escarpment (natural barrier)

Fence line

Gate

Spring

Exclosure

Pipeline

Livestock Tank

Chute Mountain
Outstanding Natural Area

Figure 8. Range Improvements

1:63,360

0 1 2 3 Miles

0 1 2 3 4 5 Kilometers

Deep Creek / Battle Creek

Outstanding Natural Area

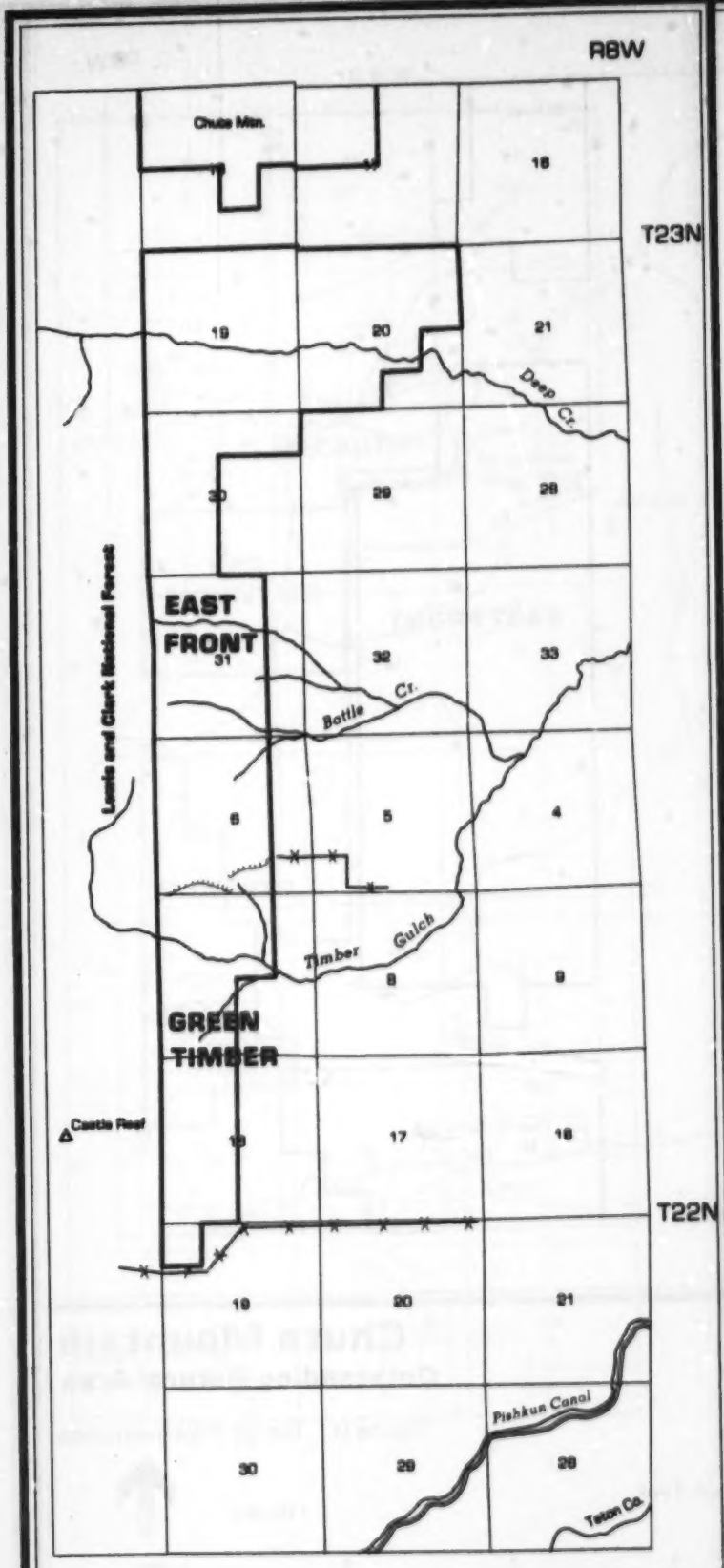


Figure 9. Range Improvements

- Escarpment (natural barrier)
- Fence line
- Gate
- Spring
- Exclosure
- Pipeline
- Livestock Tank

NORTH

0 1 2

0 1 2 3

1:63,360

Appendix 3: OIL-GAS LEASES

Blind Horse
Outstanding Natural Area

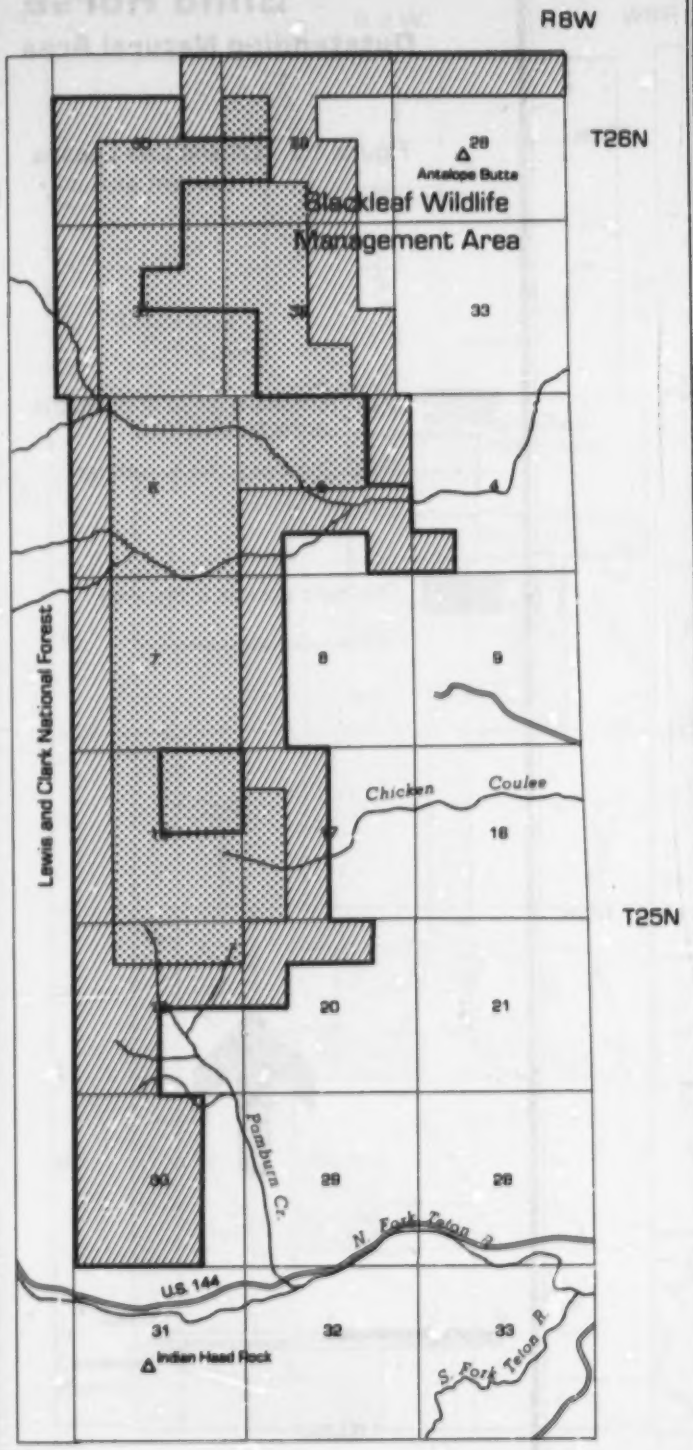


Figure 14 Oil & Gas "No Lease" and "No Surface Occupancy" Areas

These Oil/Gas lease objectives do **not** apply to pre-RMP and Activity Plan "grandfathered" leases.

ONA

No Surface Occupancy

No Lease Area

This map represents the Activity Plan objectives and RMP direction.

NORTH

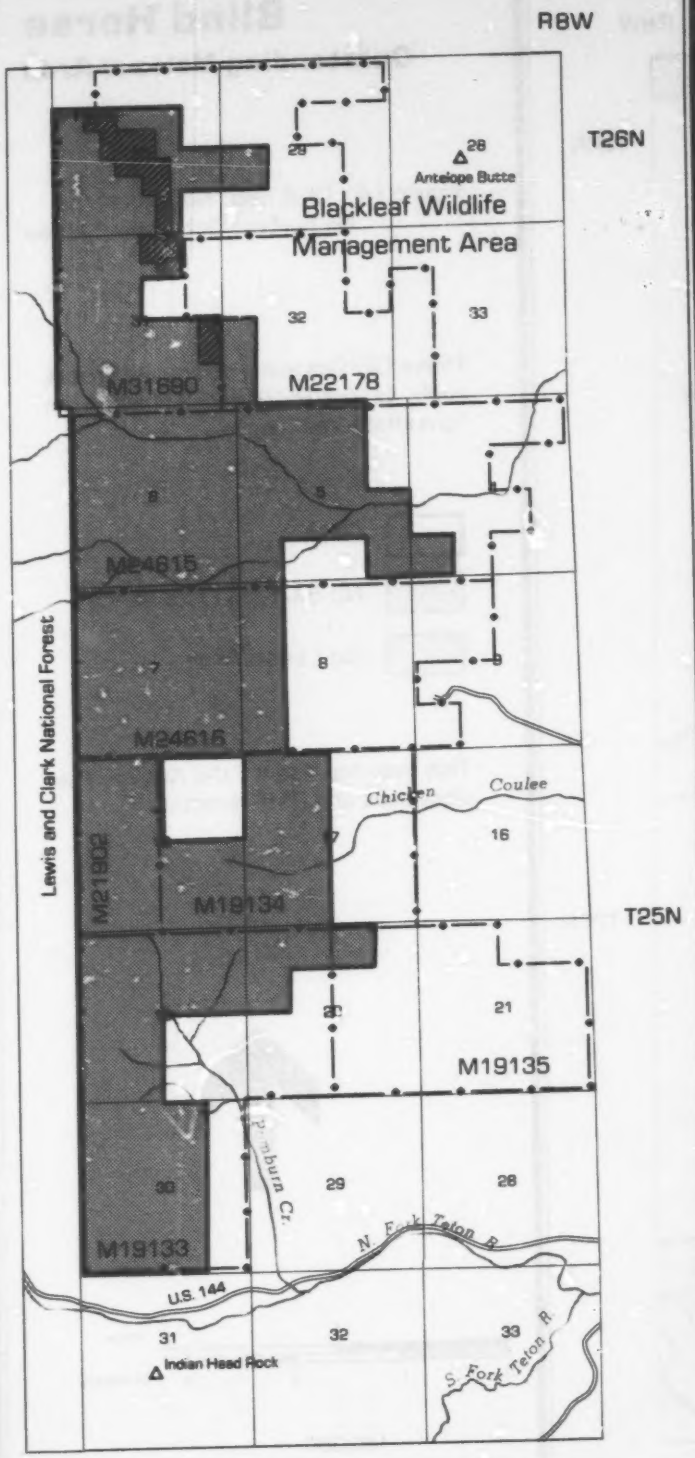
0 1 2 Miles

0 1 2 3 Kilometers

1:63,360

Blind Horse
Outstanding Natural Area

Figure 15. Oil and Gas Leases
(current status)



ONA (standard lease stipulations apply to all leases)

Oil & Gas lease line & number (e.g., M00079)

Overland access prohibited

NORTH

0 1 2 Miles
0 1 2 3 Kilometers

1:63,360

Ear Mountain
Outstanding Natural Area

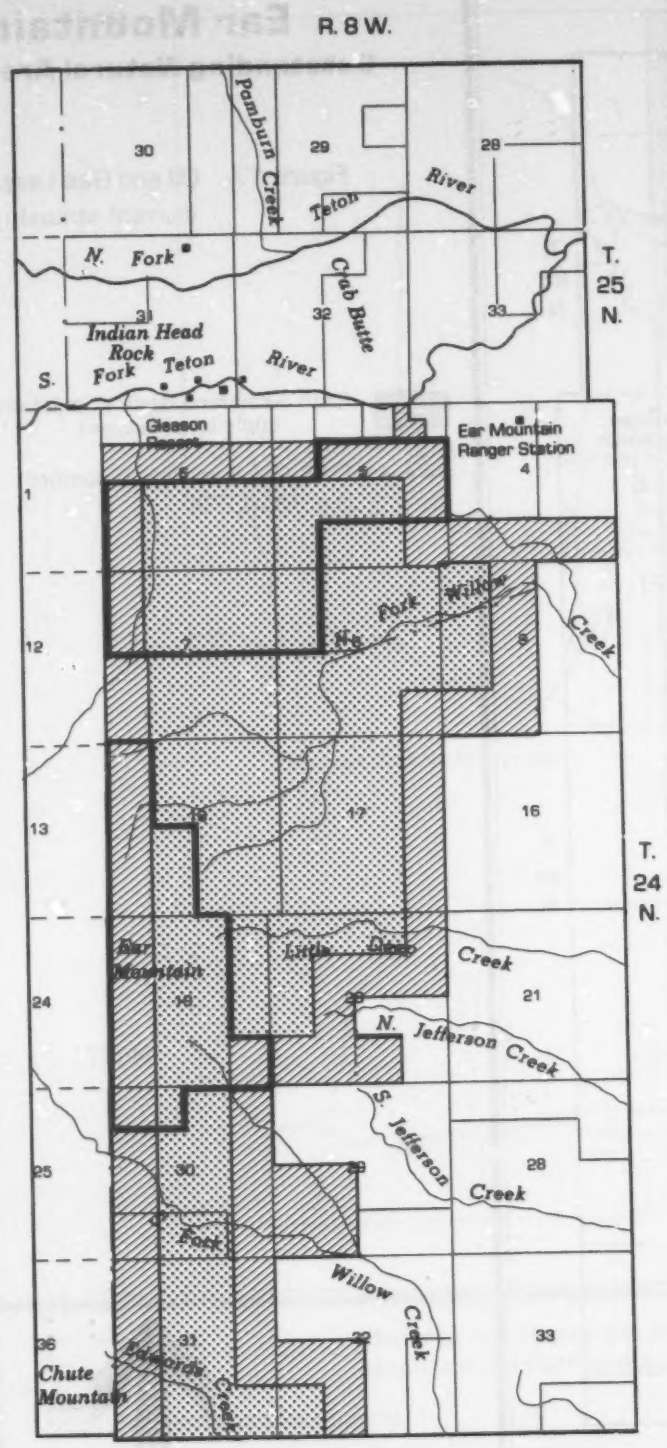


Figure 16 Oil & Gas "No Lease" and "No Surface Occupancy" Areas

These Oil/Gas lease objectives do **not** apply to pre-RMP and Activity Plan "grandfathered" leases.

- ONA
- No Surface Occupancy
- No Lease Area

This map represents the Activity Plan objectives and RMP direction.

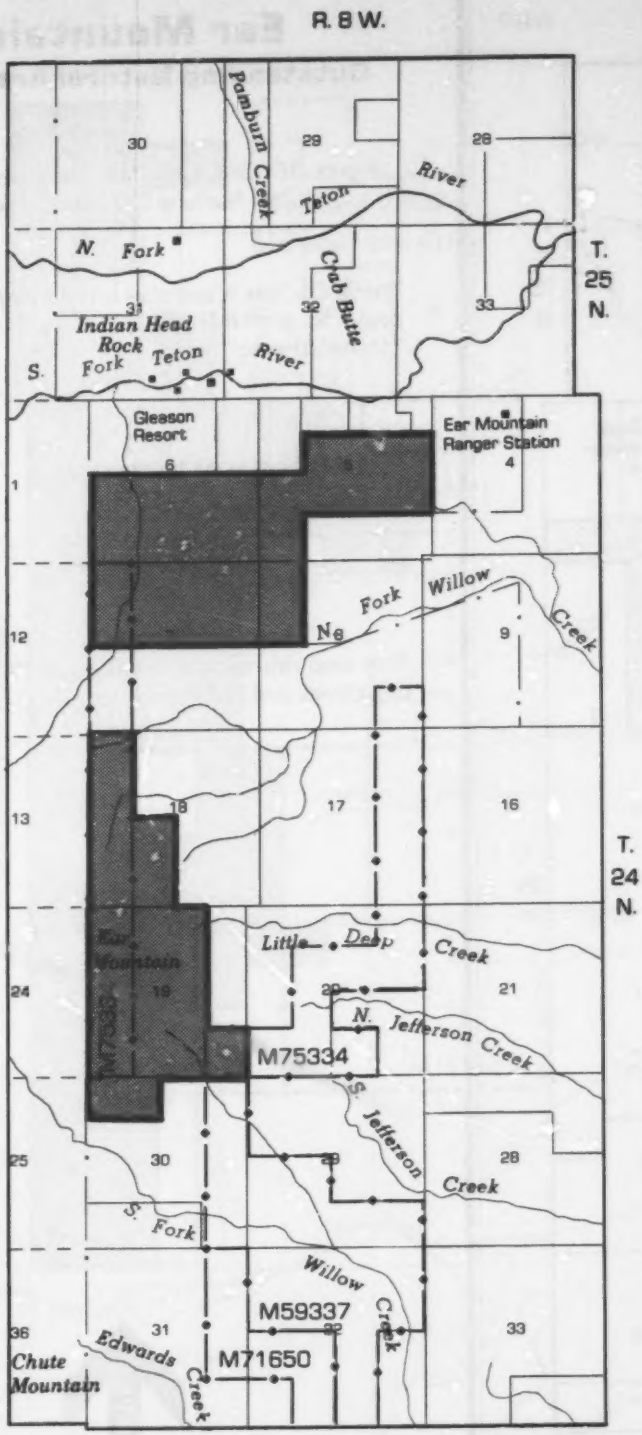
NORTH

0 1 2 Miles

0 1 2 3 Kilometers

Ear Mountain
Outstanding Natural Area

Figure 17. Oil and Gas Leases
(current status)



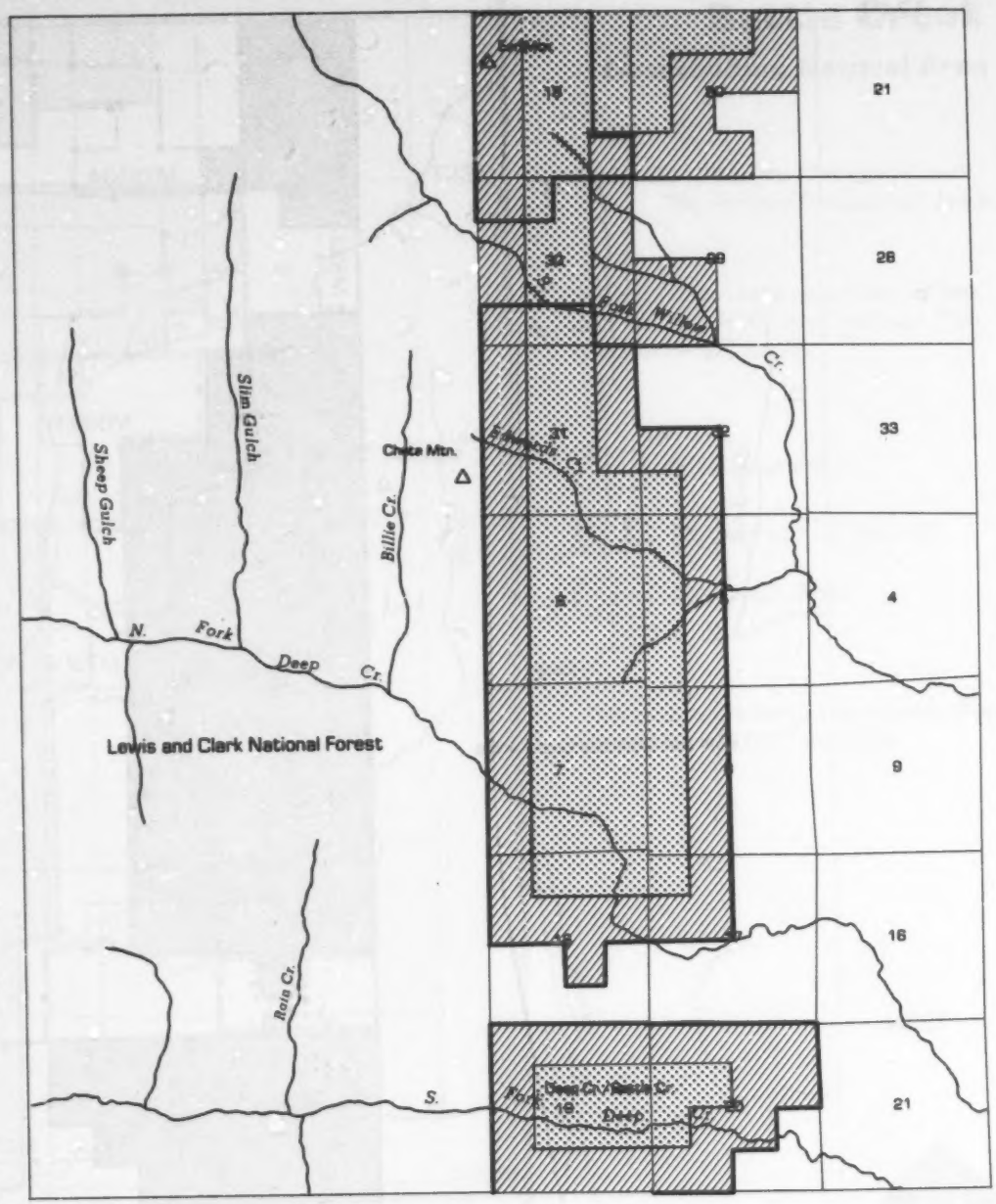
ONA (standard lease stipulations apply to all leases)

Oil & Gas lease line & number (e.g., M00079)

NORTH

0 1 2 Miles

0 1 2 3 Kilometers



ONA

No Surface Occupancy

No Lease Area

This map represents the Activity Plan objectives and RMP direction.

These Oil/Gas lease objectives do **not** apply to pre-RMP and Activity Plan "grandfathered" leases.

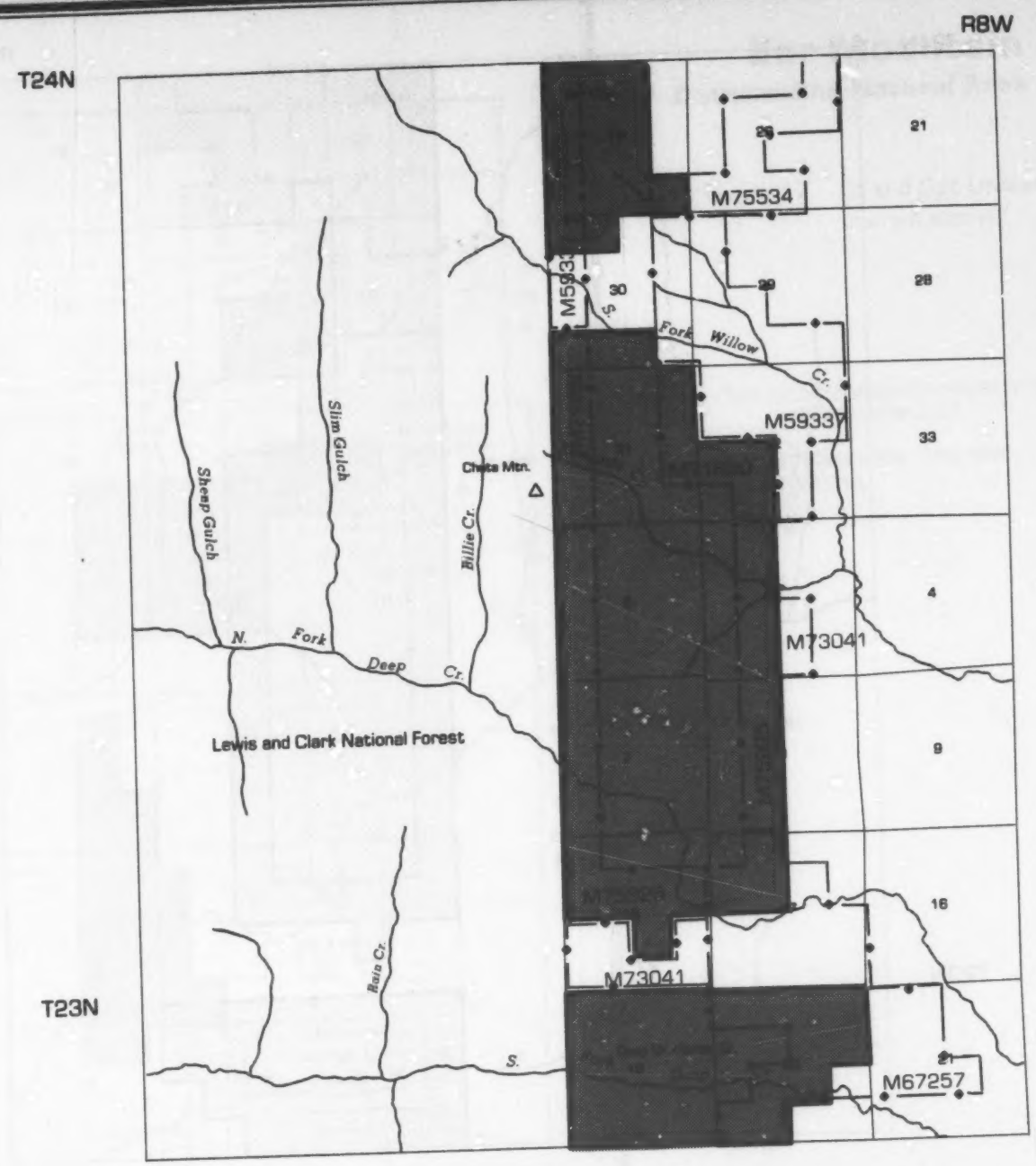
Chute Mountain
Outstanding Natural Area

Figure 18 Oil & Gas "No Lease" and "No Surface Occupancy" Areas

1:63,360

0 1 2 3 Miles

0 1 2 3 4 5 Kilometers



ONA (standard lease stipulations apply to all leases)

Oil & Gas lease line & number (e.g., M00079)

Chute Mountain
Outstanding Natural Area

Figure 19. Oil and Gas Leases (current status)

1:63,360

0 1 2 3 Miles

0 1 2 3 4 5 Kilometers

Deep Creek/ Battle Creek

Outstanding Natural Area

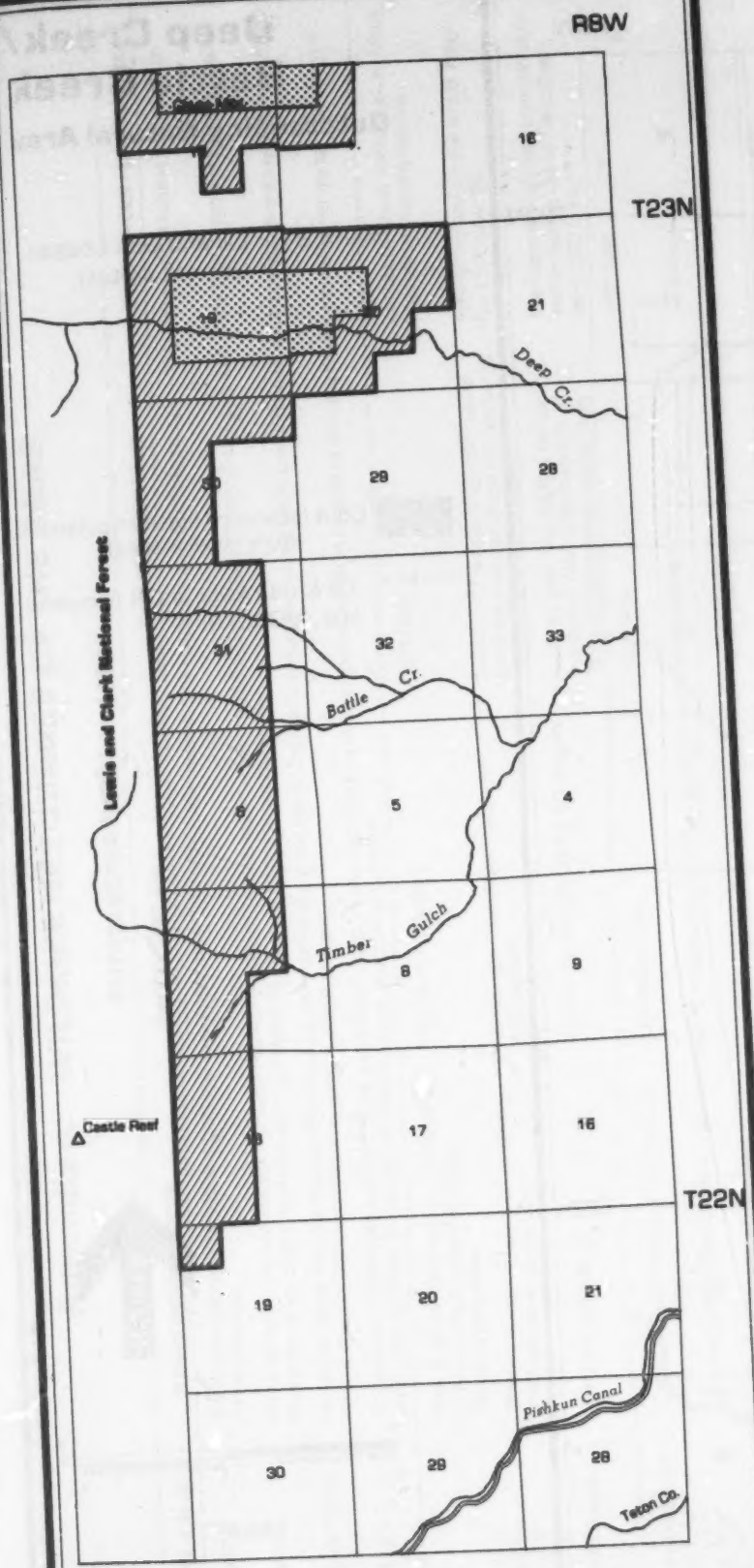


Figure 20 Oil & Gas "No Lease" and "No Surface Occupancy" Areas

These Oil/Gas lease objectives do **not** apply to pre-RMP and Activity Plan "grandfathered" leases.

ONA Boundary

No Surface Occupancy

No Lease Area

This map represents the Activity Plan objectives and RMP direction.

NORTH

0 1 2

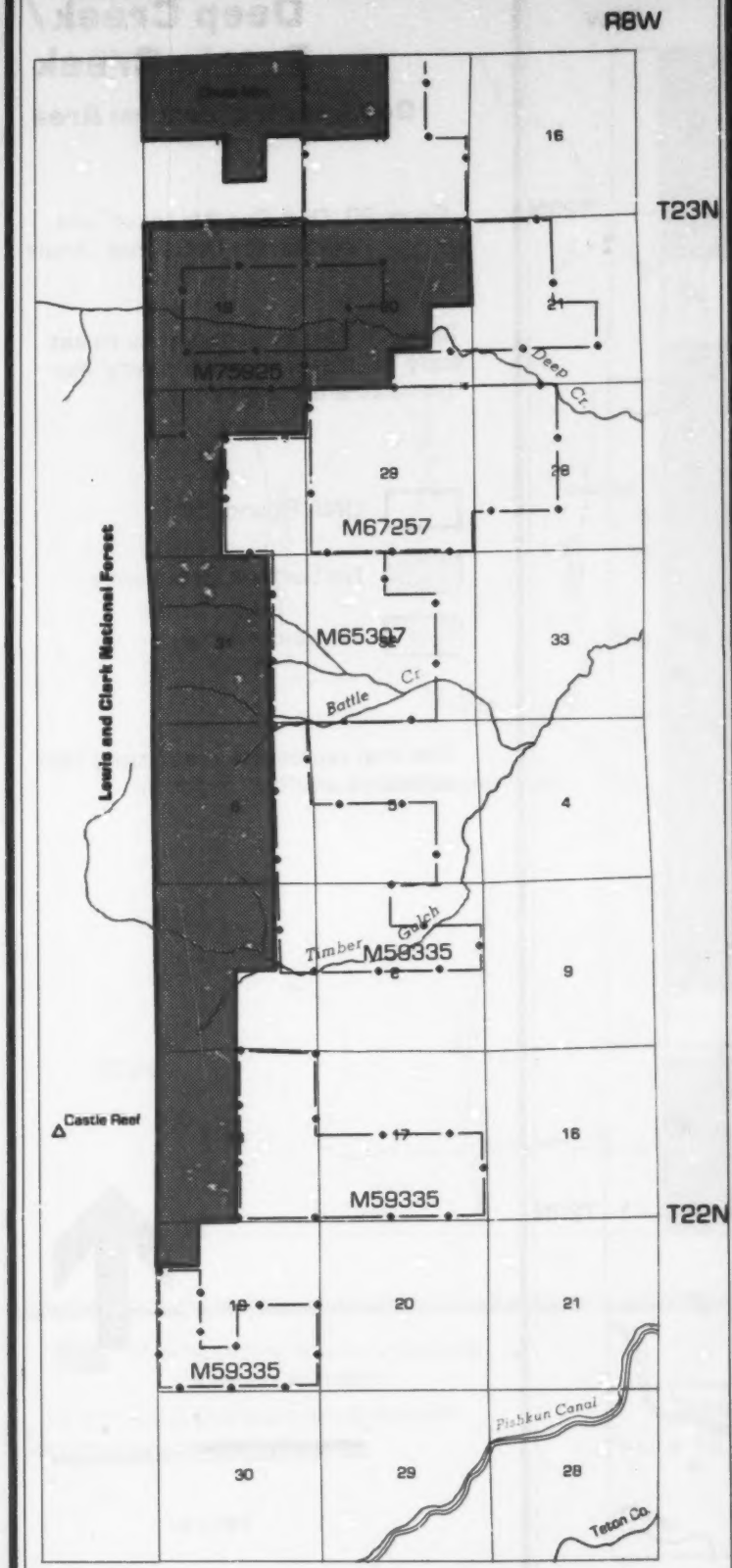
0 1 2 3

1:63,360

Deep Creek/ Battle Creek

Outstanding Natural Area

Figure 21. Oil and Gas Leases (current status)



ONA (standard lease stipulations apply to all leases)

Oil & Gas lease line & number (e.g., M00079)

NORTH

0 1 2

0 1 2 3

1:63,360

Appendix 4: WILDLIFE RESOURCES OF THE ONAS

	WILDLIFE VALUES	OUTSTANDING NATURAL AREAS			
		BLIND HORSE CREEK	EAR MOUNTAIN	CHUTE MOUNTAIN	DEEP CREEK/BATTLE CREEK
THREATENED & ENDANGERED	Grizzly bear 1, 6	ONAs are important spring, summer, and to a lesser extent fall grizzly bear habitat. The western edges of ONAs could possibly serve as den habitat, especially on Chute Mountain.			
	Gray Wolf 1, 7	ONAs lie within the Northwest Montana Recovery Area and are considered important for the future recovery of the gray wolf in the East Front and Bob marshall ecosystems. Recovery habitat is directly related to big game (prey species) habitats.			
	Peregrine Falcon 1, 5	No known nests but migrating peregrines have been noted along the Front. The Rocky Mountain Front is being considered as a reintroduction area and the high cliffs running through ONAs are rated as good to excellent habitat.			
	Bald Eagle 1, 5	Occurrence is generally confined to the major rivers such as the Sun, Teton, and Dearborn which do not traverse thru the ONAs. Incidental use by spring migrants may occur in ONAs. No nesting activity is known to occur at this time.			
BIG GAME	Elk 1	Use by elk is minor except at the north end near the Blackleaf Wildlife Management Area.	Use not documented	Light Use	Limited to Green Timber Gulch; lightly used winter/spring habitat.
	Mule Deer 1, 2, 3, 8	Primary winter range and fall/spring transitional range for 500.	Winter and "transition" range for 500 animals.	Mostly fall/spring range with some secondary winter usage for two herds of 1300 and 500 animals.	Fall/spring and crucial winter range for 1300 animals.
	Bighorn Sheep 1, 8	Seasonal habitat 30	Winter/spring habitat for 80 animals.	Used as year long habitat for two herds; Ear Mtn. and Deep Crk. of 80 and 200 animals respectively.	Year long habitat with concentrated winter/spring use of Deep Creek herd; 200 head.
	Rocky Mountain Goat 1, 4, 8	Crucial habitat, principally spring and summer range.	Occasional Use	Light Use	Light Use
	Black Bear 1, 6, 8	The Rocky Mountain Front is excellent black bear country and ONAs represent some of the better habitat areas.			
	Raptors 1, 5	Cliffs are prominent throughout the ONAs and cliff habitats are especially important raptor habitats on the Rocky Mountain Front. Prairie falcons and golden eagles are the most common cliff nesters here.			
	Mountain Grouse (blue, ruffed, Franklin's)	ONAs are excellent habitat for all three species.			
	Fisheries 9	S. Fork of Deep Creek Upper reaches could possibly contain pure strain of Westslope cutthroat; lower reaches contains rainbow/ cutthroat hybrids, and brook trout.			

WILDLIFE TABLE BIBLIOGRAPHY

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9. Hill, B., MDFW&P Fishery Biologist, Personal Communication on 3/21/88.

Appendix 5: BIOLOGICAL ASSESSMENT AND BIOLOGICAL OPINION

Pursuant to Section 7 (c) of the Endangered Species Act, 1973, for the OUTSTANDING NATURAL AREAS of the Rocky Mountain Front COORDINATED ACTIVITY PLAN 1988

Bureau of Land Management
Montana State Office
Lewistown District
Great Falls Resource Area

INTRODUCTION

A Biological Assessment was prepared for the Headwaters Resource Management Plan/Environmental Impact Statement (RMP/EIS) in May of 1983. Since this Coordinated Activity Plan (AP) for Outstanding Natural Areas (ONAs) is an extension of that RMP/EIS, many of the program activities proposed in the AP were consulted on previously, at least in the generic sense, and should require minimal further discussion. An example of this would include oil and gas leasing, exploration and development.

Proposals by the range and wildlife programs for more intensive livestock management and habitat improvement on ONAs would benefit wildlife. The positive aspects of this level of management, as related to grizzly bear and gray wolf, have also been previously summarized in the RMP/EIS.

Other programs, lands and recreation are proposing increased access to ONA boundaries which would encourage human visitation into grizzly bear and gray wolf prey species habitats which have previously been relatively undisturbed. These proposals would adversely affect these species and will require formal consultation with the U.S. Fish and Wildlife Service.

BLM is prepared to present a completed Biological Evaluation and to request formal consultation on only the Blind Horse access route for the following reasons: (1) the route is well defined as an existing road; (2) discussions, with a favorable response, have already been undertaken with the landowner concerning access acquisition; and (3) the route lies in a Bear Management Unit (BMU) with a structured Geographic Information System (GIS) allowing analysis with the Cumulative Effects Model (CEM) (USFS, 1987).

Other routes to ONA boundaries being considered for future public access will be formally consulted on when they are better defined. Furthermore, other Bear Management Units (BMUs) may be mapped for habitat components and the remainder of the GIS data prepared at that time.

THREATENED AND ENDANGERED SPECIES OCCURRENCE AND AFFECTS FROM ACTIVITY PLAN PROPOSALS

Four species classified as threatened and endangered occur along the Rocky Mountain Front (RMF), and in the ONAs. They include the endangered bald eagle, peregrine falcon, and gray wolf and the threatened grizzly bear. Documented occurrence, abundance, relative importance of habitats, and other pertinent factors have been documented in the numerous studies undertaken and completed through the RMF Task Force effort which resulted in publication of the Interagency RMF Wildlife Guidelines (BLM, 1987). Summaries of each species status, complete with an evaluation of the effects on each species from the activities proposed in this plan, are as follows.

Bald Eagle
(Haliaeetus leucocephalus)

No known bald eagle nest sites have been documented along the RMF; however, bald eagles are present on the RMF from September through April as an uncommon winter resident and migrant. Observations of eagles are most likely to be made east of the ONAs where fisheries and open water are more prevalent (DuBois, 1984).

A "no effect" determination is made as nothing proposed for ONA management would occur in areas bald eagles would be expected to frequent, especially during the breeding season. Should the unlikely occurrence of nesting activity by a pair of bald eagles ever be documented on the RMF, BLM would adhere to the RMF Wildlife Guidelines, which would alleviate any "affect" possibilities. This would include preventing human visitation or other disturbing activities within influence zones of an active nest territory.

Peregrine Falcon
(Falco peregrinus)

Suitable, but presently unoccupied, peregrine falcon habit occurs along the RMF, and this area has been proposed as a possible reintroduction area. Occasional adult peregrines assumed to be fall migrants, have been observed.

DuBois (1984) classified cliff habitats thought to be most suitable for peregrines as those which are close to extensive riparian habitat (within five kilometers), over 50 meters in height and one kilometer in extent, with numerous nesting ledges, and the majority of the cliffs under 2,300 meters in elevation. Potential nesting areas meeting these criteria were documented in both the Deep Creek—Battle Creek and Chute Mountain ONAs.

A "no effect" determination for all resource proposals is made for the peregrine for the same reasons as given for bald eagle (adherence to the RMF Wildlife Guidelines).

Gray Wolf
(Canis lupis)

The Wolf Ecology Project, University of Montana (Mattson and Ream 1978) has gathered wolf occurrence information on the RMF. Most wolf observations were made prior to that time, but with the recent advent of the "magic pack" in Glacier National Park (Robbins, J., 1986, Ream, et al. 1975, Ream, 1985) the possibility of wolf occupation including pack activity along the RMF is more of a reality. The RMF is excellent wolf habitat because of the large number of prey specie winter/spring ranges along it and because of the large expanse of wilderness behind it.

The most abundant prey inhabiting the RMF in areas where ONAs occur is mule deer, however, bighorn sheep occur in all ONAs and are relatively abundant in the Deep Creek—Battle Creek and Ear Mountain ONAs in the winter and spring. The Blackleaf elk herd would be available as prey at the northern end of the Blind Horse ONA (see Appendix 4).

The key to gray wolf recovery is maintenance or improvement of a healthy prey base. Some of the proposals put forth in the AP definitely contribute toward recovery in a very positive manner while other aspects of the AP could negatively affect prey species arid ultimately wolf occupancy.

Oil and gas leasing, exploration, and development policies in ONAs were firmly established in the RMP/EIS and no changes were proposed in this AP. Significant portions of the ONAs are designated as "No Lease," with the remainder as "No Surface Occupancy." The policy provides excellent protection for gray wolf prey and in combination with the seasonal restrictions for drilling determined for the remainder of federal mineral areas on the RMF it has resulted in a very positive effect when compared to previous leasing policies.

Implementation of intensive livestock grazing management practices in the Blind Horse ONA has significantly improved prey species habitats, and continuation of this level of management as proposed will at least maintain these conditions and more than likely will lead to more improvement. The Ear Mountain ONA has not been grazed under full capacity and prey species habitat is being maintained. The same level of grazing is proposed in this AP.

Present management practices have failed to improve prey specie habitats in the Deep Creek—Battle Creek and Chute Mountain ONAs (East Front Allotment). Failure to implement some system of deferred grazing has probably contributed to a continuing downward trend in prey species habitats, or at best, no improvement in these habitat areas.

Implementation of livestock management as proposed for the East Front allotment using a three-pasture, deferred-rotation grazing system supplemented with controlled burning, development of alternate water sources, and other beneficial practices will result in significant improvement in ungulate habitats. The Deep Creek—Battle Creek ONAs would provide the greatest mass of prey (principally mule deer and big horn sheep) of all ONAs. Anticipated range condition improvement would have a significant positive influence on wolf recovery.

The revised Northern Rocky Mountain Wolf Recovery Plan (Fish and Wildlife Service, 1987) lists key habitat components of wolf habitat one of which is abundance of natural prey and the other is minimal exposure to humans. ONAs definitely contribute to providing areas of minimal human exposure because of the limited existing access and the restrictive travel policies within them. However, should BLM obtain access routes to their borders both the prey base and special components could be lessened in value to the wolf.

The one access point where a route is defined and BLM is actively pursuing access is to the Blind Horse ONA along the Clark Fork of the Muddy Creek (Figure A5-1, segments A and B). This road is the same road which was upgraded to accommodate drilling of the Superior Oil Company No. 5-1 Gas Well at T. 25 N., R. 8 W., Section 5, SE¼. This action was formally consulted on during the fall of 1983, and the Biological Evaluation prepared at that time extensively discusses the importance of that immediate area to gray wolf prey species as well as to the grizzly bear. That evaluation also describes the anticipated affects to both the gray wolf and grizzly bear from increased human activities in this area.

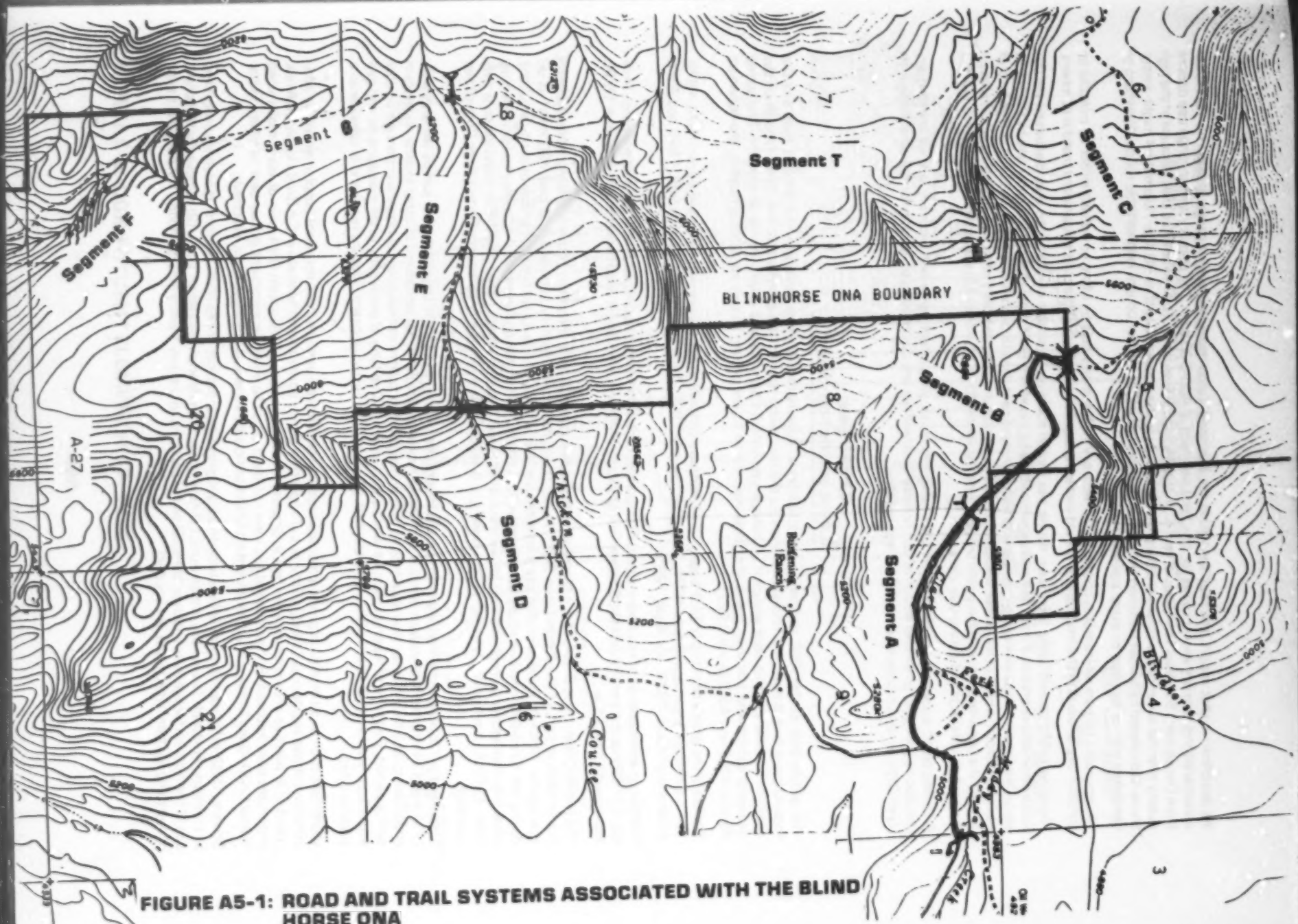

FIGURE A5-1: ROAD AND TRAIL SYSTEMS ASSOCIATED WITH THE BLIND HORSE ONA

As described in that report, the road lies within the Blackleaf-Teton mule deer winter range (Kasworm, 1981). He considered this primary winter range for this herd segment of 400-500 deer. The primary winter range use occurs from December 15 to May 15 in "typical years." In that Biological Evaluation, BLM estimated that because of the high quality thermal cover of the ridge paralleling the north side of the access road that 30 deer/kilometer^2 might winter there. If displaced by human intrusion they would be stressed as they either sought less suitable range elsewhere or competed with other deer on other suitable range.

The greatest factors which would prevent wolf recovery in this area would be killing of wolves, either by mistake or purposefully, and loss of the food source, should wintering populations of ungulates take a downward trend in numbers.

Providing public access along this route during the winter could place similar stress as to that discussed for the Superior drilling operation if road use was significant (daily). However, BLM feels that public winter use by the public along this road would be averaging considerably less or insignificant (less than one vehicle per week) and at that level of visitation displacement of mule deer would not be likely to occur and the possibility of an illegal shooting would also be unlikely. If it became apparent that public travel during the winter (Dec. 15—May 15) was significant BLM would close the road to vehicle travel during that time.

Providing public access to the Blind Horse ONA along this route "may affect" gray wolf recovery, and we are formally requesting your opinion on this action of our Activity Plan, and we are committing to initiate, formal consultation on other ONA access routes when and if we acquire them.

Grizzly Bear
(Ursus arctos horribilis)

The grizzly bear of the RMF thrives on the transitional edge between the grassland shrub habitat type and the mountainous forest habitats. This area serves as the last plains habitat occupied by grizzlies. The ONAs lie on the western boundary of this edge and contain habitat components important to grizzly during all seasons. The spring seasonal constituent element that is of critical importance to the grizzly, as well as denning habitat, are shown on Figures A5-2 and A5-3 (Aune, 1987).

Studies of the grizzly bear on the RMF began 1974, and have continued until the present (Schallenberger, 1974, 1976, 1977, Schallenberger and Jonkel, 1978, 1979, 1979a, and 1980, Aune and Stivers 1981, 1982, 1983 and Aune, Stivers and Madel, 1984, and Aune, 1985).

Population estimates of grizzly bears on the RMF portion of the Northern Continental Divide Ecosystem range from 62-93 bears, and did not include the Badger-Two Medicine BMU which was estimated to contain an additional 16-20 individuals (Dood, et.al.).

The Battle Creek-Deep Creek, Chute Mountain, and Ear Mountain ONAs lie within the Teton-Sun BMU while the Blind Horse ONA is part of the Birch-Teton BMU. Aune, 1987, reported a density estimate of 1 bear/20 mile^2 as an average for 1980-86 for an area that essentially encompassed these BMUs. Distribution of grizzly bear observations during the 1976-86 periods of study, as related to ONA locations, is shown on Figure A5-4. It is easy to conclude that whatever management programs man implements on ONAs will have an affect, either positive or negative, on grizzly bear. All ONAs have been classified as Management Situation 1 areas under Interagency Grizzly Bear Committee guidance.

The oil and gas leasing decisions made through the Headwaters RMP/EIS impact the grizzly bear just as the gray wolf. ONA areas were either leased with "No Surface Occupancy" stipulations or not leased and all other federal minerals in important grizzly bear habitat are restricted so that occupancy by industry cannot occur during the important critical spring period. This type of leasing policy, as well as application of this type of philosophy when managing oil and gas exploration and development, will provide important protection for individual bears in future years and is considered a positive effect.

Implementation of an intensive grazing management system (three-pasture rest-rotation) supplemented by construction of two exclosures to keep cattle out of important grizzly bear riparian habitats in the Blind Horse ONA has resulted in positive improvements for bears. Grazing practices in the Ear Mountain ONA have at least maintained important bear habitats. But positive steps have not been taken to enhance important grizzly bear habitats in the Battle Creek-Deep Creek and Chute Mountain ONAs principally known as the East Front allotment.

Stivers, 1988, in his recent study of livestock grazing of grizzly bear habitat on the RMF, put forth guidelines important to managing livestock. Essentially, these were; (1) defer grazing on riparian until after July 1; (2) remove cattle before use of the riparian forage base reaches 50%; (3) and exceptions to the July 1 entry may be made if the pasture is part of a grazing system (where rest is provided).

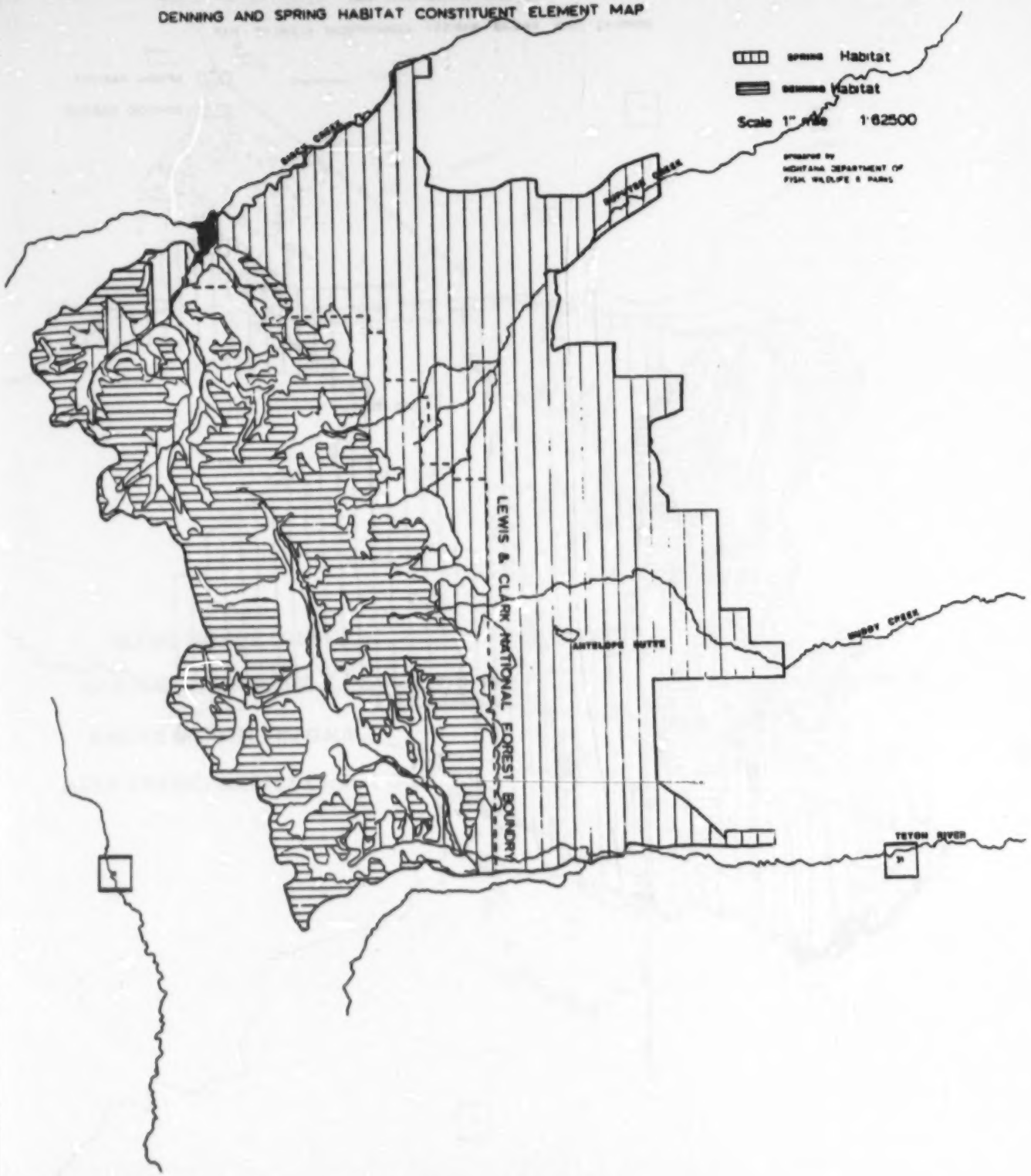

FIGURE A5-2: CONSTITUENT ELEMENT MAP, 1986

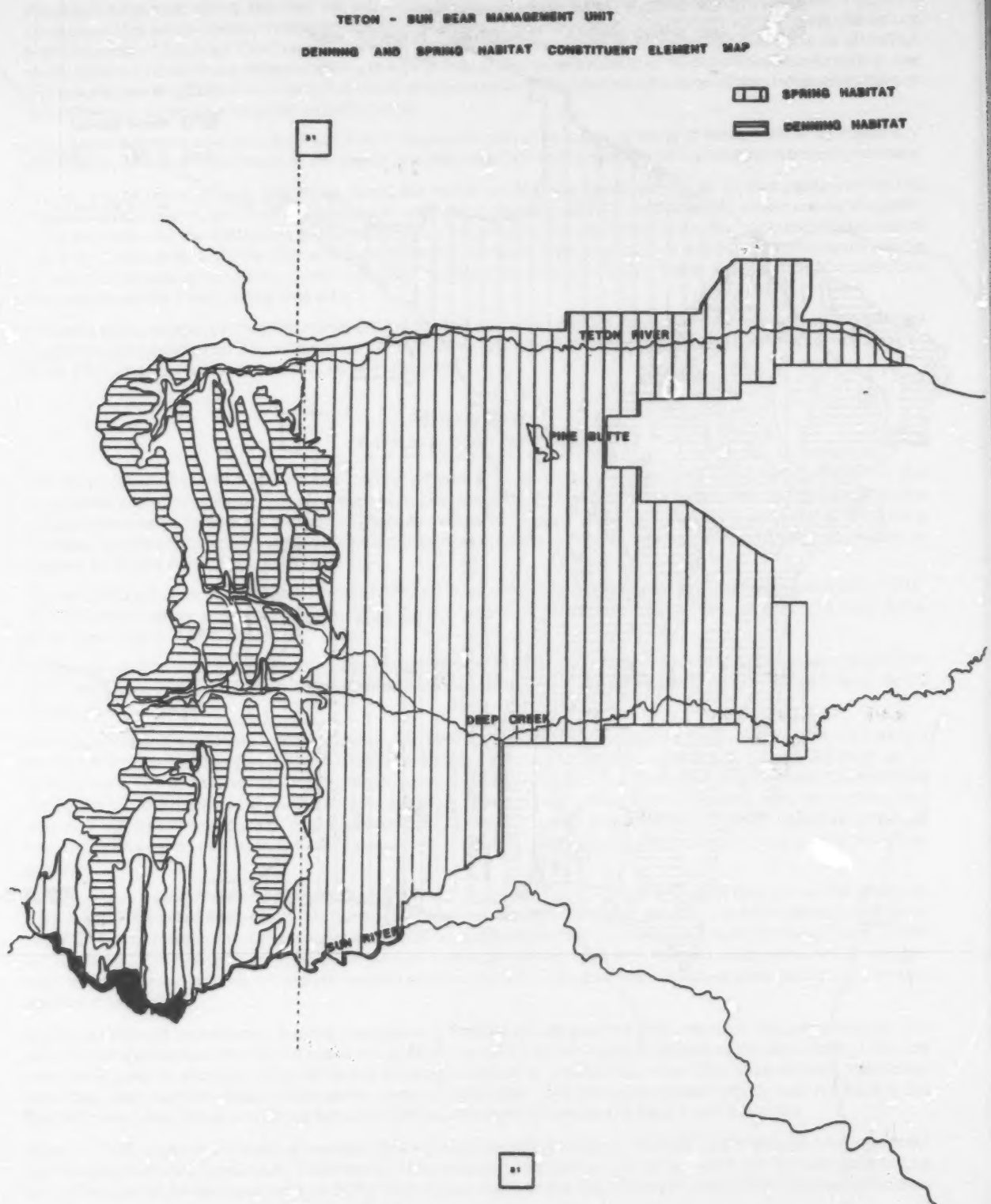

FIGURE A5-3: CONSTITUENT ELEMENT MAP, 1986

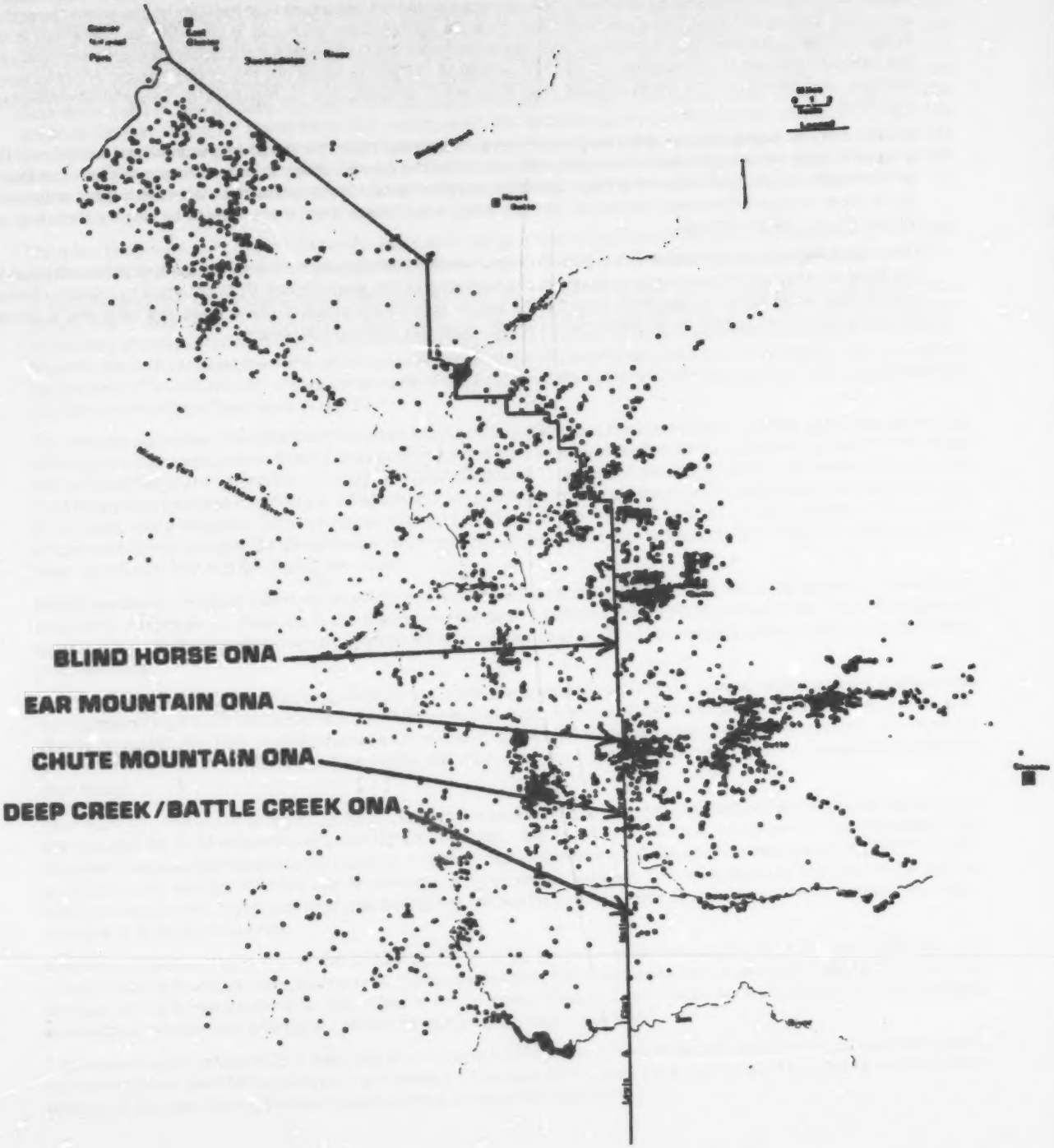

FIGURE A5-4: Distribution of 3,170 grizzly bear observations, 1976-86, north of the Sun River.

Fortunately, the phenology of vegetation on the RMF insures that livestock will not reach higher elevation ONAs until after July 1, even if they are not excluded by fences. BLM must think of the condition of all lands regardless of ownership when implementing an allotment management plan (AMP). Important bear habitats at elevations lower than the ONAs include the East Front allotment and could be substantially improved. If the AMP as presented in the Preferred Plan is accepted by the operator, significant improvement in this area for grizzly bear would be anticipated. If the operator refuses to participate in this AMP, and BLM decides to fence out the ONAs, habitat in ONAs would improve. But habitat in the larger private land area would probably not be managed by Stiver's recommended guidelines.

Access to ONA boundaries, as proposed, would have an adverse affect on grizzly bears and their habitat and the amount of adversity would probably be in direct proportion to the amount of human use occurring on the route. Bears can be negatively affected in opposite ways, by either being forced to vacate usable and preferable habitat or by using these areas because they have habituated to man, which would make them more likely to be illegally shot or to be subject to controlled removal.

Of the general routes proposed as access to ONA boundaries, BLM is prepared only to initiate formal consultation on the Blind Horse route for the reasons stated at the beginning of this assessment. BLM commits to initiating formal consultation on all other routes when they can be better defined and state-of-the-art analysis tools are available. Generally, increased access on all these routes would negatively affect grizzly bears.

CUMULATIVE EFFECTS ANALYSIS OF THE PROPOSED PUBLIC ACCESS ON THE BLIND HORSE CREEK ROAD

The reviewer is referred to the USFS, 1987, publication on "Cumulative Effects Analysis Process for the RMF Northern Continental Divide Grizzly Bear Ecosystem" for descriptions of the complicated modeling processes and formulas used in the computer assisted analysis. The CEM is composed of two phases: (1) data base construction phase; and (2) the analysis phase. Within the data base construction phase there are two submodels that develop the data base; habitat, and activity. The habitat submodel uses data variables (food, cover, edge value etc.) to arrive at seasonal habitat values for the subunit. The activity submodel creates zones of influence for each activity based on nature and type of activity, disturbance coefficients (DC), cover-noncover relationships and determines the habitat values for the vegetative units within the zone-of-influence. The analysis phase uses results from the data base construction phase as data for formulas that calculate the model results; habitat effectiveness and mortality risk index.

The basic geographic unit of the CEM is the vegetation polygon (individually delineated units of vegetation). The model results calculates values based on the inherent habitat values of polygons as affected by various human activities.

In this presentation, only those activity coefficients (Table A5-1) used in comparing management of 1.8 miles of road (Figure A5-1, Segments A and B) are shown under either private or BLM administration; and a more restrictive monitoring of trail use through the ONA (Segment T) was also calculated. All other roads and trails associated with the Blind Horse ONA retained the same activity and duration of activity coefficients as those originally put in the program for the Birch/Teton BMU. An analysis was made of the Preferred Plan where BLM would institute a spring closure on the Blind Horse Road (Segments A and B).

For analysis purposes, the difference between the No Action Plan (existing) and Preferred Plan were that under the existing private management there would supposedly be no human activity (either by vehicle or by foot) on the Blind Horse Road (Segments A and B) or through the ONA (Segment T) during the spring period. If BLM were to manage the road they would open it during this period which should lower habitat effectiveness and increase the bear mortality risk. BLM would more diligently enforce vehicle restrictions through the ONA during the summer and fall on Segment T which would lower the activity classification from motorized low-use to non-motorized. This should be a benefit to the bear during summer and fall (See Table A5-2).

Model results for Habitat Effectiveness (HE) and Mortality Risk Index (MRI) for both plans are shown in Tables A5-3 and A5-4, respectively. Analysis units shown are for both the Blind Horse Road subunit (six USGS topographic quadrangles which were within six miles of the influence of the road and trail activities) and for the Birch—Teton BMU in its entirety.

As shown on these tables and as anticipated in the initial discussion of this section, a slight reduction in HE is evidenced during the spring if BLM opens the road, but HE increases in the summer and fall due to more intensive restrictions on the trail through the ONA. As also would be expected, should BLM institute a road closure in the spring, the HE would increase (Table A5-3). BLM will institute such a closure in the spring if human use of the road increases to a significant level (daily).

Bear mortality risk would be expected to increase in the spring with no road restrictions; but would slightly decrease in the summer as BLM exercised greater control over vehicles as a result of implementation of the Preferred Plan. However, because MRI coefficients make no differentiation between motorized and non-motorized use (USFS, 1987, p. 19) and only change for high use or low use, programming Segment T from motorized low-use under private management to non-motorized high use during the fall hunting period under BLM management resulted in a slight increase in bear mortality risk.

It became apparent from this initial CEM analysis that an analysis weakness exists for this type of activity. The difference in high-use vs. low-use roads at eight vehicles per/day is not adequate to properly analyze the effects of changes in road management as described in these Plans. That problem might be experienced in other analysis scenarios. Perhaps finer categories should be designed for use in the CEM.

The relative significance of CEM data results for HE and MRI will be hard to interpret until the model has been used a number of times for RMF activities. In this analysis, the data differences were very small. This should indicate minor effects to the bear from increased public access to this ONA boundary.

TABLE A5-1

ACTIVITY CODES AND CLASSIFICATION USED IN THIS ANALYSIS
(highest to least influence)

Code	Activity Group	Criteria
111	Motorized, High Use	$\geq$ 8 vehicles/day
112	Motorized, Low Use	$<$ 8 vehicles/day
211	Non-Motorized, High Use	$\geq$ 3 parties/day — Heavy & Extra Heavy on Trail Inventory 300 users/season
212	Non-Motorized, Low Use	$<$ 3 parties/day — Low and Moderate on Trail Inventory 300 users/season

TABLE A5-2

ACTIVITY CHANGES ON BLIND HORSE CREEK ROAD AND WITHIN THE ONA AS PROGRAMMED IN THE NO ACTION PLAN AND PROPOSED PLAN

	Type of Activity (Refer to Table)		Duration of Activity	
Road or Trail Seg.	Existing (private management)	Proposed (BLM management)	Existing	Proposed
A	112	112	*07/01-10/15 restricted thru June	*01/01-10/15 12/01-12/31
	111	111	10/16-11/30	10/16-11/30
	112	112	*07/01-10/15	*01/01-10/15
B	111	111	10/16-11/30	10/16-11/30
	112*	211*	*07/01-11/30 motor low use	*10/16-11/30
T&G	212	212	01/01-10/15	01/01-10/15

* Indicates programmed differences in existing and proposed alternatives.

TABLE A5-3

HABITAT EFFECTIVENESS AS MEASURED BY THE CEM FOR PR.VATE (existing situation) VERSUS BLM (proposed) MANAGEMENT OF ROADS ASSOCIATED WITH THE BLIND HORSE ONA

	Blind Horse Road Analysis Sub Unit			Birch Teton BMU Analysis Unit			
	Existing Situation	Proposed Road Management	Difference	Spring Road Closure A & B	Existing	Proposed	Difference
SPRING							
Sub Unit HV	.6538	.6538		.6538	.6435	.6435	
Sub Unit HE	.5511	.5480	Slight Reduction	.5495	.5115	.5106	Slight Reduction
% Reduction	15.6987	16.1802		15.9550	20.5217	20.6513	
SUMMER							
HV	.5139	.5139			.5109	.5109	
HE	.3434	.3456	Slight Increase		.3396	.3419	Slight Increase
% Reduction	33.1704	32.7487			33.5275	33.0791	
HV	.5900	.5900			.5664	.5664	
FALL							
HE	.3448	.3477	Slight Increase		.3098	.3129	Slight Increase
% Reduction	41.5599	41.0780			45.2997	44.7448	

TABLE A5-4

MORTALITY RISK INDEX AS MEASURED BY THE CEM FOR PRIVATE (existing situation) VERSUS BLM (proposed) MANAGEMENT OF ROADS ASSOCIATED WITH THE BLIND HORSE ONA

	Birch/Teton BMU Analysis Unit		
Season	Existing Situation	Proposed Road Management	Difference
Spring	.07715	.07822	+.001 Slight Increase
Summer	.11958	.11748	-.002 Slight Decrease
Fall	.31060	.31192	+.001 Slight Increase

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:

M.02 Outstanding Natural Areas-Rocky Mountain Front, Activity Plan

September 29, 1988

Mr. Wayne Zinne, District Manager
Bureau of Land Management
Lewistown District Office
80 Airport Road
Lewistown, Montana 59457-9699

Dear Mr. Zinne:

This is in response to your August 5, 1988, letter transmitting the Activity Plan/Environmental Assessment - Rocky Mountain Front Outstanding Natural Areas for our review and comment and request for formal consultation.

The Activity Plan proposes to provide public access to the four Outstanding Natural Areas (ONAs) by acquiring a total of eight access routes to the ONA boundaries. The Bureau of Land Management (BLM) biological assessment for endangered and threatened species, however, only evaluates one access route (existing road along Blind Horse Creek) into the Blind Horse ONA while recognizing that the other routes will adversely affect endangered and threatened species and will require formal consultation on each individual route at the time they are identified. Your request for consultation was only on acquiring public access using the existing road along the south side of Blind Horse Creek into the Blind Horse ONA. We are concerned that the biological assessment does not evaluate the combined effects of all of the proposed access routes on listed species and that incremental evaluations will not provide the decision maker with the actual or cumulative impacts that the public access proposal will have on grizzly bears and ungulate populations (prey for the gray wolf).

We therefore recommend that formal consultation be withdrawn and BLM amend the biological assessment so that:

1. A combined analysis of both proposed routes to the Blind Horse ONA is provided for the Birch Teton Bear Management Unit, and

2. A combined analysis of all of the proposed access routes to the remaining three ONAs in the Teton Sun River Bear Management Unit (Ear Mountain, Chute Mountain and Deep Creek/Battle Creek ONAs) is provided.

This approach will provide BLM with information regarding the cumulative impact of the public access proposal, an opportunity to identify specific road management strategies needed to minimize road use impacts on wildlife resources, and a basis for making a "no effect/may affect" determination for endangered and threatened species.

Thank you for the opportunity to review and comment on the activity plan for the Rocky Mountain Front Outstanding Natural Areas. Your cooperation and interest in meeting our joint responsibilities under the Endangered Species Act is appreciated. If you have questions regarding our recommendations, please contact Dale Harms at (406)449-5225 or FTS 585-5225.

Sincerely,

Wayne G. Brewster
State Supervisor
Montana State Office

cc: Douglas Burger, Area Manager, BLM, Great Falls RA, Great Falls, MT
Chris Servheen, Grizzly Bear Recovery Coordinator, FWS, Missoula, MT

DRHARMS/clh

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

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ACTION

IN REPLY REFER TO:

M.02 Outstanding Natural Area -
Rocky Mtn. Front - Activity
Plan (6-MT-89-F-001)

Mr. Wayne W. Zinne, District Manager
Bureau of Land Management
Lewistown District Office
80 Airport Road
Lewistown, Montana 59457-9699

Dear Mr. Zinne:

This is to acknowledge your request for the initiation of formal consultation under Section 7 of the Endangered Species Act on the proposed Blindhorse Creek Road access acquisition into the Blindhorse Outstanding Natural Area along the Rocky Mountain Front, Teton County, Montana.

We will send you our biological opinion on this project as soon as possible, but no later than January 20, 1989.

Sincerely,

Ronald A. Crete

for Wayne G. Brewster
State Supervisor
Montana State Office

cc: ARD, FWE-60120, FWS, RO, Denver, CO
Douglas J. Burger, BLM, Great Falls RA, Great Falls, MT

DRHORNING/clh

"Take Pride in America"

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
LEWISTOWN DISTRICT OFFICE
80 Airport Road
Lewistown, Montana 59457-9699

IN REPLY REFER TO
2800

Fish and Wildlife Service
Fish and Wildlife Enhancement
ATTN: Wayne G. Brewster, State Supvr.
Federal Bldg., U.S. Courthouse
310 South Park
P. O. Box 10023
Helena, MT 59626

Dear Wayne,

In reply to your letter of September 29, 1988, and upon further consideration of the amount of access actually necessary for the public to enjoy ONA lands and to meet our other management objectives, we have evaluated public comment and are considering reducing the number of access routes to the eastern boundaries of the ONA's.

For the Blindhorse ONA, inclusive to the Birch-Teton Bear Management Unit (BMU), we are presently considering access only on the Blindhorse Creek road. This is the road which was evaluated in the activity plan and submitted to you for consultation. Please provide us with an opinion on this access, as it is the only route we are now proposing in that BMU. Additional public access to this ONA occurs through the Blackleaf Wildlife Management Area (WMA) on the north end and off the Teton County Road through Forest lands up Clary Coulee on the south/west end.

When we consult on other routes in the Teton-Sun River BMU, we will do so as a comprehensive evaluation of a complete proposal of all of the routes proposed in that BMU. At this point we do not see the need to pursue additional access into the Ear Mountain ONA as existing access from the county road on the north and a road into the Ear Mountain WMA on the east may be sufficient. Instead of two and three routes into the Chute Mountain and Deep Creek/Battle Creek ONA's, respectively, a lesser number of routes may provide sufficient access into the ONA's lying within the Teton-Sun River BMU.

I have appreciated your involvement and advice in this matter, and respectively request your opinion on the Blindhorse access road at this time.

Sincerely yours,

Wayne W. Zinne
District Manager

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:

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ASSOC. DM.
ADMIN.
P/EA 12-CHY 1-3-89
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LEWISTOWN, MT
ACTION Copy to GFRA
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December 15, 1988

M.02 Outstanding Natural Areas - Rocky Mountain Front Activity Plan (6-MT-89F-001)

MEMORANDUM

To: District Manager, Lewistown District Office, BLM., Lewistown, MT

From: Acting State Supervisor, Montana State Office, Fish and Wildlife Enhancement, FWS, Helena, MT

Subject: Biological Opinion - Outstanding Natural Areas/Rocky Mountain Front Activity Plan

This is the U.S. Fish and Wildlife Service's (Service) biological opinion prepared in response to your October 19, 1988, request for formal consultation on the proposed Blind Horse Creek Road access acquisition into the Blind Horse Outstanding Natural Area along the Rocky Mountain Front, Teton County, Montana. The conclusion of your biological evaluation is that a no effect situation exists for the bald eagle (Haliaeetus leucocephalus) and peregrine falcon (Falco peregrinus), however, a may effect determination was concluded for the grizzly bear (Ursus arctos horribilis) and gray wolf (Canis lupus irremotus). The Service concurs with the conclusions stated in the biological evaluation.

The Service has examined the proposed activity in accordance with the Interagency Cooperation Regulations under Section 7 of the Endangered Species Act, as amended (50 CFR 402 and U.S.C. 1531 et seq.). This biological opinion does not refer to the overall environmental acceptability of the proposed action, only its potential effects on the grizzly bear and gray wolf.

Project Description

The Headwaters Resource Management Plan (HRMP) and Environmental Impact Statement (EIS) and the subsequent Record of Decision established and designated four Outstanding Natural Areas (ONA) along the Rocky Mountain Front (RMF). ONAs are defined in 43 CFR 2071.1 as "Areas of outstanding scenic splendor, natural wonder, or scientific importance that merit special attention and care in management to insure their preservation in their natural condition. These usually are relatively undisturbed, representative of rare botanical, geological or zoological characteristics of principle interest for scientific and research purposes." The ONAs total 13,087 acres and feature massive limestone cliffs and geologic features rising to 7,700 feet from 5,000 foot plains. The prominent geographic features include: Blind Horse Creek, Deep Creek, Battle Creek, Ear Mountain, and Timber Gulch. The area is

F. Item of Interest page 2

nketed with conifers, hardwoods, softwoods, shrubs, and grasses. The hly dissected topography supports numerous wildlife and some fisheries; has a nearly pristine wilderness quality. The HRMP/EIS (1984) established ad management direction for ONAs to "protect the wildlife habitat, scenery other surface resources from disturbance" and "to ensure they are managed entially as wilderness". An Activity Plan/Environmental Assessment was pared to provide specific objectives, constraints, and management policy all proposed actions on the ONAs. This ONA/Activity Plan addresses the r ONAs (Blind Horse, Ear Mountain, Chute Mountain, Deep Creek-Battle Creek) located along the RMF. The Federal action being considered in this consultation is the proposed Blind Horse Creek Road access acquisition into the Blind Horse ONA. This is an existing road lying along the south side of Blind Horse Creek. Additional public access to this ONA occurs through the Blackleaf Wildlife Management Area to the north and off the Teton County Road through Forest Service lands up Clary Coulee on the southwest end.

The ONA/Activity Plan also proposes to provide public access to the other ONAs by acquiring existing access routes to their boundaries. The Blind Horse Creek Road is the only access route being proposed to the Blind Horse ONA and is within the Birch-Teton Bear Management Unit (BMU) (October 19, 1988 letter requesting consultation). The remaining three ONAs are located within the Teton-Sun River BMU. To insure the cumulative impacts to grizzly bears of all proposed access routes are adequately evaluated, future access acquisition proposals will be combined and analyzed utilizing the Cumulative Effects Model (CEM) within the Teton-Sun River BMU. This comprehensive evaluation approach will provide BLM with information regarding cumulative impacts of public access proposals and an opportunity to identify specific road management strategies needed to minimize road use impacts.

Biological Opinion

It is the Service's biological opinion that the proposed Blind Horse Creek Road access acquisition into the Blind Horse ONA is not likely to jeopardize the continued existence of either the grizzly bear or the gray wolf.

Basis of Opinion

Gray Wolf: The RMF is considered excellent wolf habitat for several reasons: the area's large size, abundant and diverse prey base, wilderness status, or otherwise remote areas, and relatively low human use. At present, available data does not indicate sustained pack activity or a viable wolf population in the area, however, sporadic wolf observations indicate possible use, at least by transient individuals. There have been 90 wolf occurrence reports recorded on the RMF (Glacier National Park/East of the Continental Divide, Blackfeet Indian Reservation, Bureau of Land Management/Great Falls Resource Area and Lewis and Clark National Forest) during the last decade (1978-88 U.S. Fish and Wildlife Service files), 60 percent of these have occurred within the last three years (1985-88) and seven percent have occurred within a 10 km^2 area centered around the proposed access road acquisition. The potential for a breeding pair to establish residence and pack formation to develop through natural recruitment appears eminent.

Two key factors for successful wolf recovery in the area are: (1) preventing illegal mortality and (2) maintenance or improvement of a healthy prey base. To aid in achieving wolf recolonization the integrity of ONAs should be preserved by ensuring that limited access and restrictive travel policies are maintained. As recognized in your biological assessment, should additional access routes to ONA boundaries be acquired, potential consequences include: (1) killing of wolves, either purposefully or by mistake, and (2) the reduction or loss of a food source should wintering ungulate numbers take a downward trend. Following our review of your ONA/Activity Plan and biological assessment, we conclude that the access acquisition of the Blind Horse Creek Road, while adhering to the Interagency RMF Wildlife Guidelines, would provide proper assurances that the proposed road acquisition would not preclude the survival and recovery of the wolf. Our conclusion is based on the following program level guidelines and criteria established within the ONA/Activity Plan and RMF/Wildlife Guidelines that ensure and assist in the protection of key species and resources.

A. ONA/Activity Plan

1. No changes were made to policies directed toward oil/gas leasing, exploration and development in ONAs that provided protection to the wolf and its prey base. These policies were firmly established in the HRMP/EIS, reviewed, evaluated and commented on in a subsequent biological opinion from the Service (see consultation #6-1-88-F-005, February 3, 1984, U.S. Fish and Wildlife Service files).

2. Ungulate habitat enhancement would be emphasized and achieved through livestock grazing lease plans. Implementation of a livestock management program using a three pasture, deferred rotation grazing system supplemented with controlled burning and development of alternate water sources would result in a significant improvement to ungulate habitat.

3. The area serves as primary winter range for mule deer and elk from December 15 to May 15. Therefore, if public vehicle use between these dates becomes significant (more than 1 vehicle/day) the road will be closed to vehicle travel during this time period.

B. Interagency RMF General and Species Specific (Mule Deer and Elk) Wildlife Management Guidelines

1. Provides for the evaluation of human activities, combinations of activities, or zones of influence of such activities and avoids those which may adversely impact the species or reduce habitat effectiveness.

2. Imposes seasonal closures and/or vehicle restrictions based on wildlife or other resource needs on roads which are retained in the transportation system.

3. Avoids disturbance related to human activities on identified seasonally important mule deer and elk habitat.

The HRMP does not provide specific direction for full plan implementation. However, the ONA/Activity Plan provides specific ONA management direction by specifying objectives, constraints and management policy for all proposed actions on the ONAs. The application and monitoring of policies and guidelines found in the Interagency RMF Wildlife Guidelines and ONA/Activity Plan will assist managers in successfully coordinating multiple-use objectives with the biological requirements of the wolf while meeting the resource management objectives identified in the ONA/Activity Plan document.

Grizzly Bear: The proposed Blind Horse Creek Road access acquisition is located in the Birch-Teton BMU and within Grizzly Bear Management Situation I habitat as defined by the Interagency Grizzly Bear Guidelines (51 FR 42853). Situation I areas contain grizzly bear population centers and habitat components needed for the survival and recovery of the species or a segment of its population. Increased access to ONA boundaries will encourage human visitation into valuable wildlife habitat, which has previously been relatively undisturbed, potentially leading to conflicts with the grizzly bear or other endemic species. An increased mortality risk and reduced habitat effectiveness are two consequences that result when human activity occurs in grizzly bear habitat. The CEM developed for the Rocky Mountain Front (USFS et al., 1987) was designed to provide resource managers an analytical tool for evaluating existing as well as potential habitat effectiveness levels and mortality risk relative to some proposed activity in a quantifiable manner throughout a BMU or BMU sub-unit. The cumulative effects analysis process developed on the Kootenai National Forest (Christensen and Madel 1982) has operated under the philosophy of maintaining a minimum of 70 percent freely available space (habitat effectiveness) throughout all BMUs delineated on the Forest. Managers commonly use threshold habitat effectiveness levels between 70-80 percent for non-listed species such as elk. To date, no process for establishing thresholds has been completed on grizzly bear CEMs to define and validate threshold levels of habitat effectiveness or mortality risk required to meet recovery targets outlined in the Grizzly Bear Recovery Plan. However, the CEM is capable of analyzing data and producing outputs that can be used for comparison purposes with the existing situation, to document trends, or in use with a combination of other parameters, to explore relative consequences of proposed actions.

For analysis purposes, the CEM was utilized in comparing different management strategies for the 1.8 miles of proposed road access under private (existing situation) or Bureau of Land Management (BLM) administration (preferred action plan); and more restrictive trail use. Under the existing situation (no action plan) it is assumed there would be no human activity (either by vehicle or foot) on the Blind Horse Creek Road or throughout the ONA during the spring season. All other roads and trails would remain the same as the original CEM program for the BMU. Under BLM management, the Blind Horse Creek Road would remain open yearlong with more intensive trail use restriction during the summer and fall. However, BLM would institute a spring closure on the Blind Horse Creek Road if vehicle travel becomes significant (more than 1 vehicle/ day).

The model output calculates habitat effectiveness (HE) values (based on the inherent values of polygons affected by various human activities) and

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a mortality risk index (MRI). Seasonal habitat values (SHV) can also be calculated within an analysis area. The difference between HE and SHV is the exclusion of the activity habitat factor (AHF) variable for the SHV equation. The AHF is calculated by summing for each activity within the zone of influence, the activity duration multiplied by the displacement coefficient associated with the appropriate activity. Therefore, the AHF variable functions in the equation by reducing the HE level. The differences in outputs produced by the model for HE by each alternative analyzed in the BMU and BMU sub-unit were very small (Table 1A), as were the MRI calculations for the BMU (Table 1B). These results indicate that the change in road management under the BLM proposal for the 1.8 mile stretch of existing road has minor impact on grizzly habitat and potential bear mortality when viewed from the entire BMU perspective. The relative significance of the outputs, however, as they relate to grizzly bear recovery objectives, are difficult to interpret. It would be premature to develop conclusions from the indexes due to the lack of biologically established thresholds and sensitivity analysis. However, habitat units (habitat quality and quantity) calculated by the CEM provide meaningful biological rationale for drawing conclusions about proposed activities and potential consequences to the grizzly bear.

BMUs are management units delineated within the grizzly bear recovery zone and were developed to provide a way that cumulative effects analysis areas could be divided into biologically meaningful smaller management units. Each BMU contains sufficient constituent elements and effective habitat to meet a subpopulation goal for adult female grizzly bears. Polygons, individually delineated units of vegetation, form the basic unit utilized in the CEM. An individual polygon's habitat value coefficient is multiplied by its acreage and collectively, within the zone of influence of a proposed activity, the products are summed. The summation total, known as habitat units, can be used to compare seasonal quality and quantity of polygons between BMUs or BMU sub-units. The habitat unit is an expression of available seasonal habitat in units that can be measured, duplicated in other areas that have been habitat component mapped, and then used for comparison purposes. Thus, habitat units allow for evaluation of adjacent BMUs in terms of comparability.

Habitat units were calculated for the BMU and BMU sub-unit for the: (1) baseline situation (no human activities), (2) existing situation (no action plan/current human activity level) and (3) proposed activity (preferred action plan with and/or without a spring road closure). The habitat units are displayed in a line chart that graphically demonstrates baseline, existing and proposed activity relationships for the BMU (Figure 1) and BMU sub-unit (Figure 2). The preferred action plan would cause a slight reduction (.13%) of spring habitat units relative to the existing situation for the entire BMU (216,905 acres), nevertheless nearly 80 percent of the spring habitat units remain as effective habitat (Table 2). Thus, the preferred action plan keeps the spring habitat units above the 70 percent habitat effectiveness threshold level established for other wildlife species (Figure 1). Both the summer and fall habitat unit values for the existing situation are below the 70 percent threshold level of habitat effectiveness (Figure 1). If the preferred action plan were adopted this situation would not change, however habitat unit values would display an increase in the summer (.45%) and fall (.56%) (Table 2). The BMU sub-unit (157,820 acres or 74 percent of entire BMU) exhibits a similar

pattern of small data differences when comparing the preferred action plan with the existing situation. Seasonal trends are the same for baseline, existing and proposed activities between the BMU and BMU sub-unit. The alternative which includes the spring road closure in the BMU sub-unit would reduce the spring habitat units by .25 percent from the existing situation and without the spring road closure habitat units are reduced .48 percent (Table 3). Therefore, a spring road closure causes a .23 percent gain of spring habitat units.

Habitat units were used to compare the baseline, existing and proposed scenarios, to examine trends, and also as a parameter to explore relative consequences of the preferred action plan. In these analyses, the percentage difference for seasonal habitat units were consistently under one percent, indicating only minor effects to the grizzly bear could be expected. Although habitat units are not in themselves a threshold level identifying how many grizzly bears an area can support, they add perspective to spatial information.

Maintaining the integrity and viability of the BMU to remain a functional grizzly bear use area necessitates that an appropriate management framework be in place which is compatible with the Interagency Grizzly Bear Guidelines, the HRMP and subsequent ONA/Activity Plan. By adhering to established RMF/ Wildlife Guidelines and guidelines incorporated into the ONA/Activity Plan, BLM management emphasis will be directed toward protection of the grizzly bear and its habitat. Therefore, we believe adequate measures are in place to insure potential adverse impacts from the proposed road acquisition will be minimal and not at a level that would reduce the likelihood of the survival or recovery of the grizzly bear by reducing their reproduction, numbers, or distribution.

Conservation Recommendations

Section 7 of the ESA specifies two mandates for Federal agencies. Section 7(a)(1) directs Federal agencies to utilize their authorities to further the purposes of the Act by implementing a conservation program for listed species. Section 7(a)(2) requires Federal agencies to insure their actions are not likely to jeopardize the continued existence of listed species or adversely impact their critical habitat. BLM can further meet their Section 7 requirements by adopting the following recommendations:

1. Define, create and institute a monitoring program to document seasonal vehicle use levels occurring on the Blind Horse Creek Road and within the Blind Horse ONA.

2. Criteria should be established to annually evaluate and possibly adjust levels and patterns of vehicle use occurring on the Blind Horse Creek Road and within the Blind Horse ONA.

3. Should grizzly bear mortality or an increase in bear/human conflicts be documented along the Blind Horse Creek Road, a road closure should be initiated.

4. Install appropriate signing that should indicate:
   a. Seasonal road closure dates;
   b. No off road vehicle use except on designated trails; and
   c. Report violators.

Section 9 of the Endangered Species Act prohibits any taking (killing, harming or harassment) of listed species without special exemption. Under the terms of Section 7(b)(4) of the Act, taking that is incidental to, and not a purpose of, the Agency action is not considered taking within the terms of the Act, provided that such taking does not violate Section 7(a)(2). Due to coordination measures and program level guidelines established within the ONA/Activity Plan and RMF/Wildlife Guidelines that reduce potential conflicts with bears and wolves, the anticipated level of incidental take resulting in the death of either a grizzly bear or gray wolf from the proposed road acquisition is zero. This biological opinion has concluded that the anticipated incidental take through harm and harassment due to displacement of bears or wolves is not at a level that would violate Section 7(a)(2).

Taking of grizzly bears other than that described in this opinion must be in conformance with the 50 CFR S17.40(b) and shall be in accordance with the Interagency Grizzly Bear Guidelines (51 FR 42863).

This completes the Service's biological opinion on the effects the proposed Blind Horse Creek Road access acquisition may have on the endangered gray wolf and threatened grizzly bear. If the proposed action is significantly modified or new information becomes available that reveals impacts that were not considered in this biological opinion, consultation with the Service should be reinitiated. Your cooperation and interest in meeting our joint responsibilities under the Endangered Species Act, is appreciated.

Sincerely,

Kemper M. McMaster
Acting State Supervisor
Montana State Office

cc: Director, FWS, Washington, DC (FWE/EHC/OES)
Regional Director, RO, FWS, Denver, CO (MS-60100)
State Director, Montana State Office, BLM, Billings, MT
Grizzly Bear Recovery Coordinator, FWS, Missoula, MT
7757

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LITERATURE CITED

Christensen, A.G., and M.J. Madel. 1982. Cumulative effects analysis process, Kootenai National Forest. 38pp.

U.S. Forest Service, Montana State Department of Fish, Wildlife and Parks, Bureau of Land Management and U.S. Fish and Wildlife Service. 1987. Cumulative Effects Analysis Process for the Rocky Mountain Front Northern Continental Divide Grizzly Bear Ecosystem. 41pp.

TABLE 1A

HE and SHV as measured by the CEM for Private (existing situation) and BLM (proposed situation) management associated with the Blind Horse ONA.

	Birch-Teton BMU Sub-Unit			Birch-Teton BMU	
	E	P_1	P_2	E	P_1
Spring					
SHV	.6538	.6538	.6538	.6435	.6435
HE	.5511	.5480	.5495	.5115	.5106
Summer					
SHV	.5139	.5139		.5109	.5109
HE	.3434	.3456		.3396	.3419
Fall					
SHV	.5900	.5900		.5664	.5664
HE	.3448	.3477		.3098	.3129

E - existing situation

P_1 - proposed situation with no spring road closure

P_2 - proposed situation with a spring road closure

TABLE 1B

MRI as measured by the CEM for Private (existing situation) versus BLM (proposed situation) management associated with the Blind Horse ONA.

	Birch-Teton BMU Analysis Unit		
Season	Existing Situation	Proposed Road Management	Difference
Spring	.07715	.07822	+.001 Increase
Summer	.11958	.11748	-.002 Decrease
Fall	.31060	.31192	+.001 Increase

TABLE 2

Seasonal Habitat Units for the Baseline (no activity), Existing (current activity) and Proposed (preferred action plan) situations in the Birch-Teton BMU

	B	E	P_1
Spring			
Habitat Units	139,583.95	110,938.95	110,758.01
Habitat Units Reduced		28,645.00	28,825.94
% Habitat Units Reduced		20.52	20.65
% Habitat Units Remaining		79.48	79.35
Summer			
Habitat Units	110,807.19	73,656.31	74,153.12
Habitat Units Reduced		37,150.88	36,654.07
% Habitat Units Reduced		33.53	33.08
% Habitat Units Remaining		66.47	66.92
Fall			
Habitat Units	122,845.03	67,196.60	67,878.28
Habitat Units Reduced		55,648.34	54,966.75
% Habitat Units Reduced		45.30	44.74
% Habitat Units Remaining		54.70	55.26

B - Baseline habitat unit value

E - Existing habitat unit value

P_1 - Proposed habitat unit value with no spring road closure

TABLE 3

Seasonal Habitat Units for the Baseline (no activity), Existing (current activity) and Proposed (preferred action plan) situations in the Birch-Teton BMU Sub-Unit

	B	E	P_1	P_2
Spring				
Habitat Units	103,179.75	86,981.87	86,485.06	86,717.44
Habitat Units Reduced		16,197.88	16,694.69	16,462.31
% Habitat Units Reduced		15.70	16.18	15.95
% Habitat Units Remaining		84.30	83.82	84.05
Summer				
Habitat Units	81,106.47	54,203.13	54,545.19	
Habitat Units Reduced		26,903.34	26,561.28	
% Habitat Units Reduced		33.17	32.75	
% Habitat Units Remaining		66.83	67.25	
Fall				
Habitat Units	93,116.90	54,417.61	54,866.40	
Habitat Units Reduced		38,699.29	38,250.50	
% Habitat Units Reduced		41.60	41.08	
% Habitat Units Remaining		58.40	58.92	

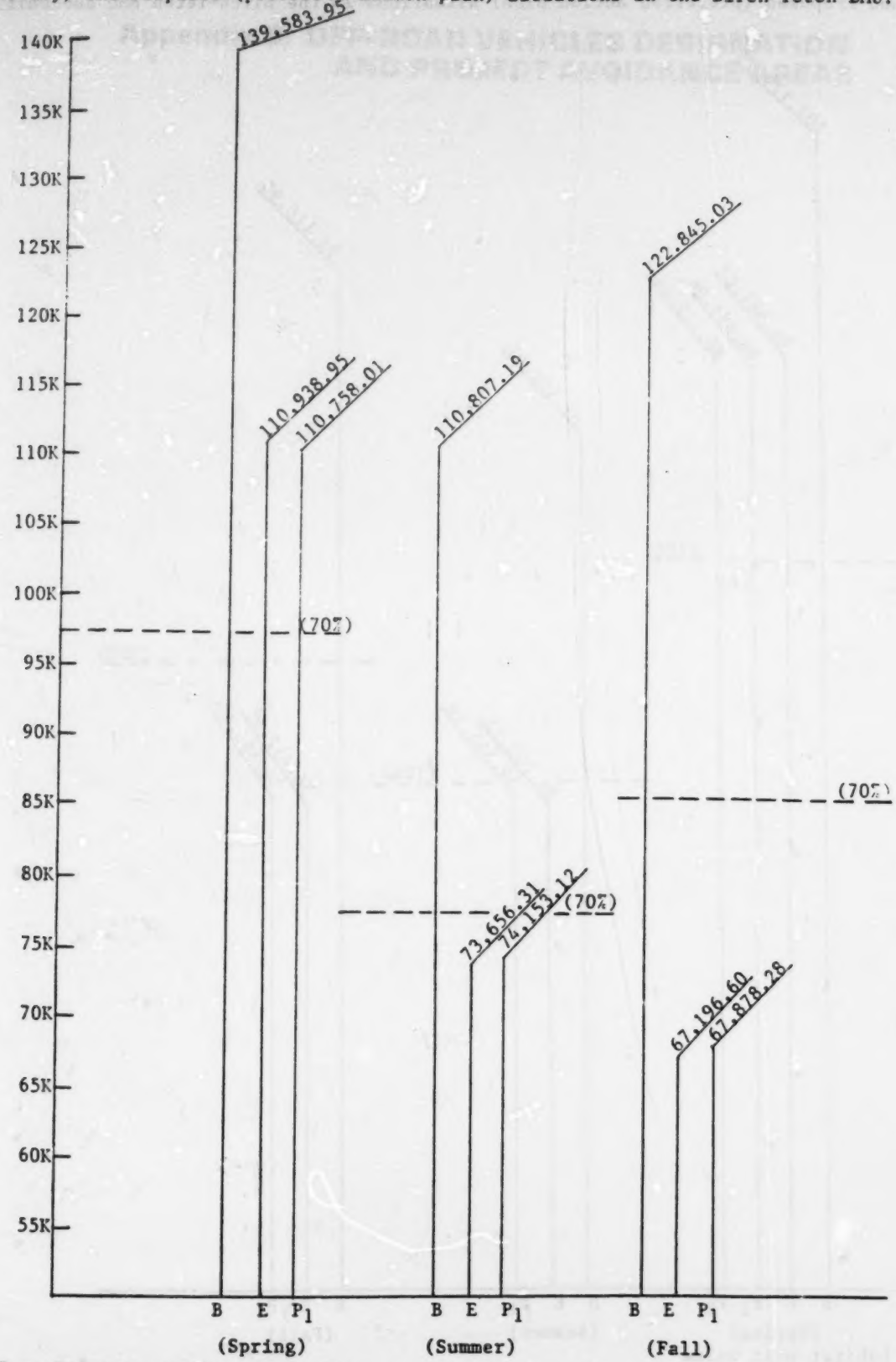
B - Baseline habitat unit value

E - Existing habitat unit value

P_1 - Proposed habitat unit value with no spring road closure

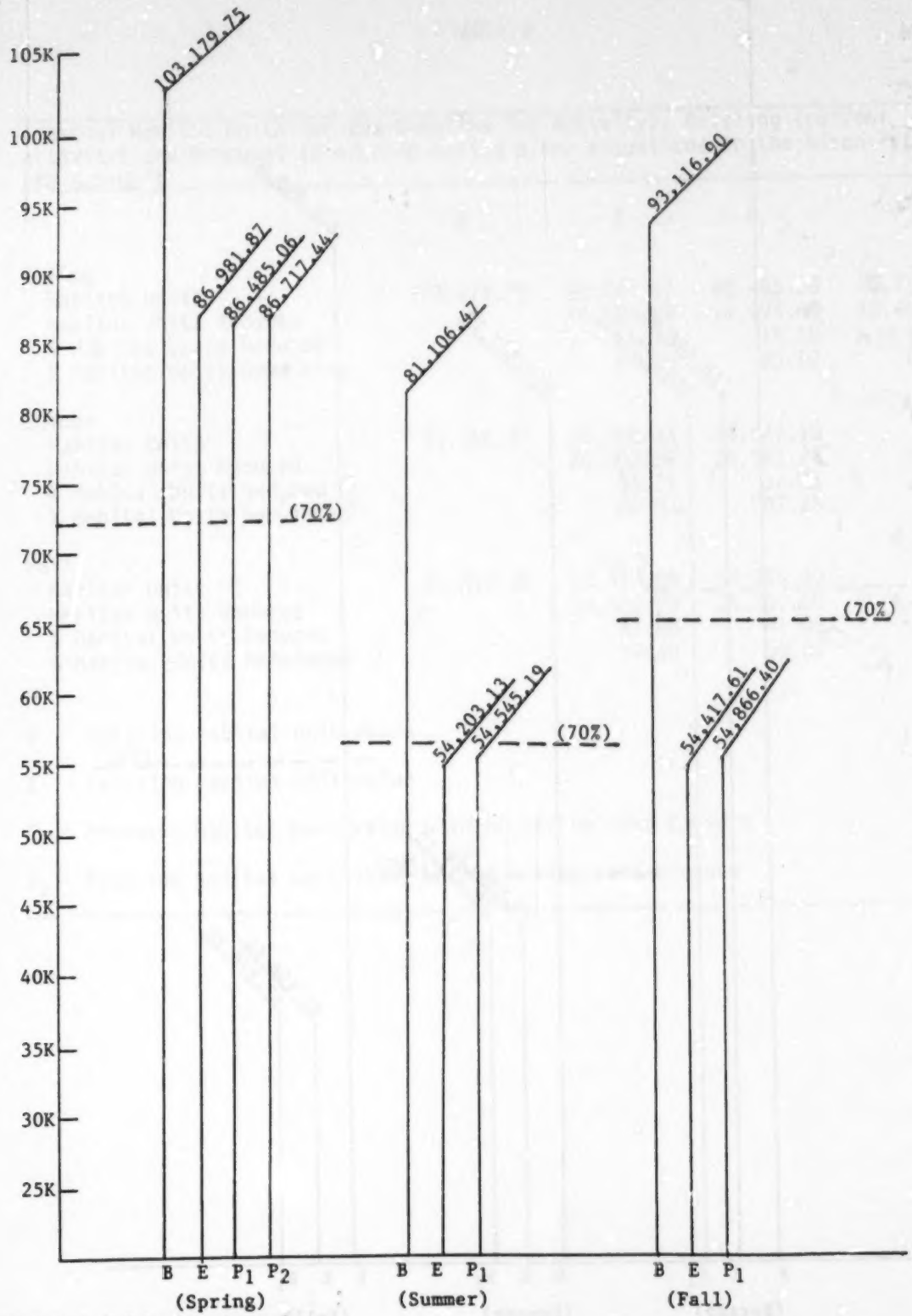
P_2 - Proposed habitat unit value with a spring road closure

Figure 1. Seasonal Habitat Unit Values for the Baseline (no activity), Existing (current activity) and Proposed (preferred action plan) situations in the Birch-Teton BMU.



B - Baseline habitat unit value
E - Existing habitat unit value
P_1 - Proposed habitat unit value with no spring road closure

Figure 2. Seasonal Habitat Unit Values for the Baseline (no activity), Existing (current activity) and Proposed (preferred action plan) situations in the Birch-Teton BMU Sub-Unit.



B - Baseline habitat unit value
E - Existing habitat unit value
P_1 - Proposed habitat unit value with no spring road closure
P_2 - Proposed habitat unit value with a spring road closure

Appendix 6: OFF-ROAD VEHICLES DESIGNATION AND PROJECT AVOIDANCE AREAS

Blind Horse
Outstanding Natural Area

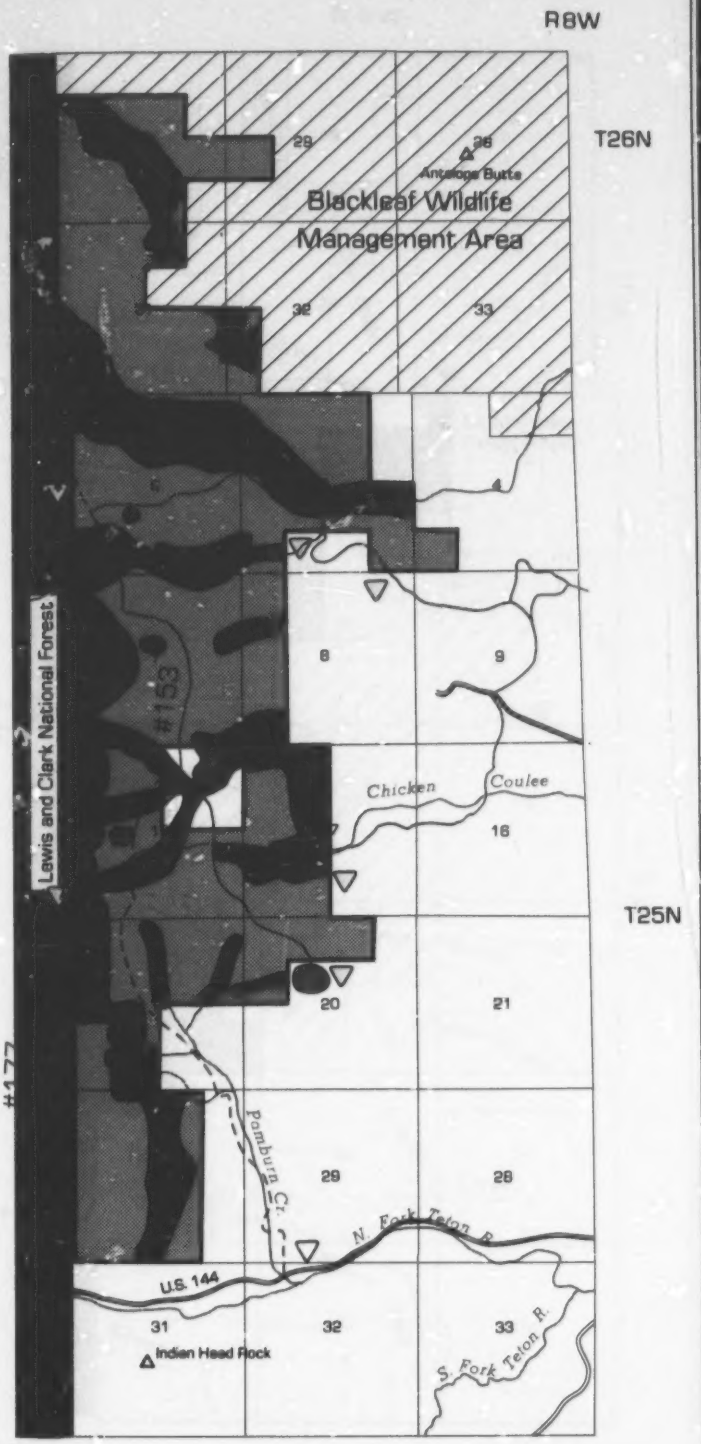


Figure 10. Avoidance Areas and ORV designations.

- ONA Boundary Sign (closed to all motorized vehicles)
- Informational Sign
- ONA Area (closed to all motorized vehicles)
- State/Private
- Forest Service
- Riparian Avoidance Area*
- Slope Avoidance Area*
- Private Roads/Trails (need landowner permission)
- Public Roads/Trails

*No developments (including potential powerlines, pipelines, roads and trails resulting from existing mineral leases will be allowed in slope and riparian avoidance areas.

NORTH

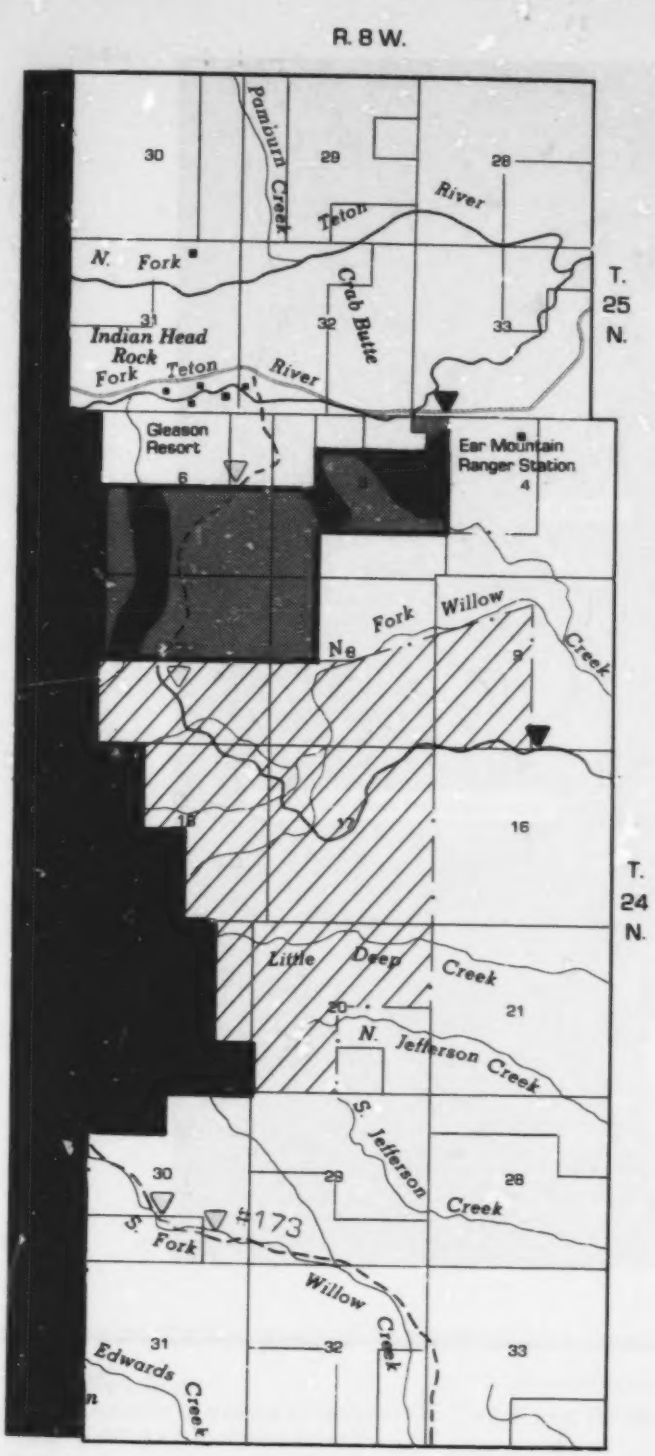
0 1 2 Miles

0 1 2 3 Kilometers

1:63,360

#177 — Clary Coulee Trail — USFS

#153 — Mt. Frazier — Chicken Coulee Trail — USFS



Ear Mountain

Outstanding Natural Area

Figure 11. Avoidance Areas and ORV designations.

- ONA Area (closed to all motorized vehicles)
- State/Private
- Ear Mountain State Wildlife Management Area
- U.S. Forest Service
- Riparian Avoidance Area*
- Slope Avoidance Area*
- Private Roads/Trails (need landowner permission)
- Public Roads/Trails
- ONA Boundary Sign (closed to all motorized vehicles)
- Public Access Trailhead
- Informational Sign
- #173 — Willow Creek Plateau Trail USFS

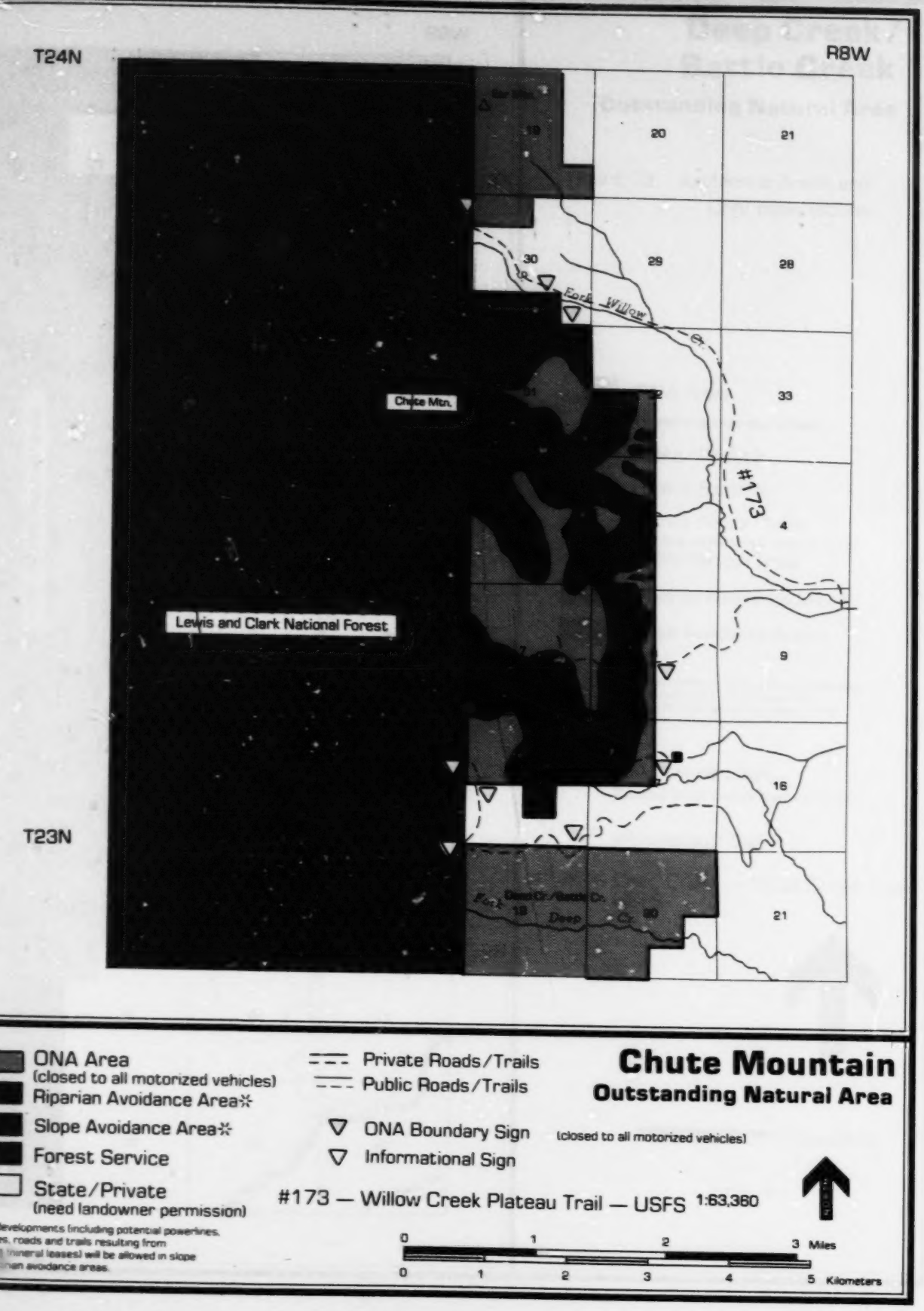
*No developments (including potential powerlines, pipelines, roads and trails resulting from existing mineral leases will be allowed in slope and riparian avoidance areas.

NORTH

0 1 2 Miles

0 1 2 3 Kilometers

Figure 12. Avoidance Areas and ORV designations.



ONA Area
(closed to all motorized vehicles)
Riparian Avoidance Area*
Slope Avoidance Area*
Forest Service
State/Private
(need landowner permission)

Private Roads/Trails
Public Roads/Trails

ONA Boundary Sign
Informational Sign

#173 — Willow Creek Plateau Trail — USFS

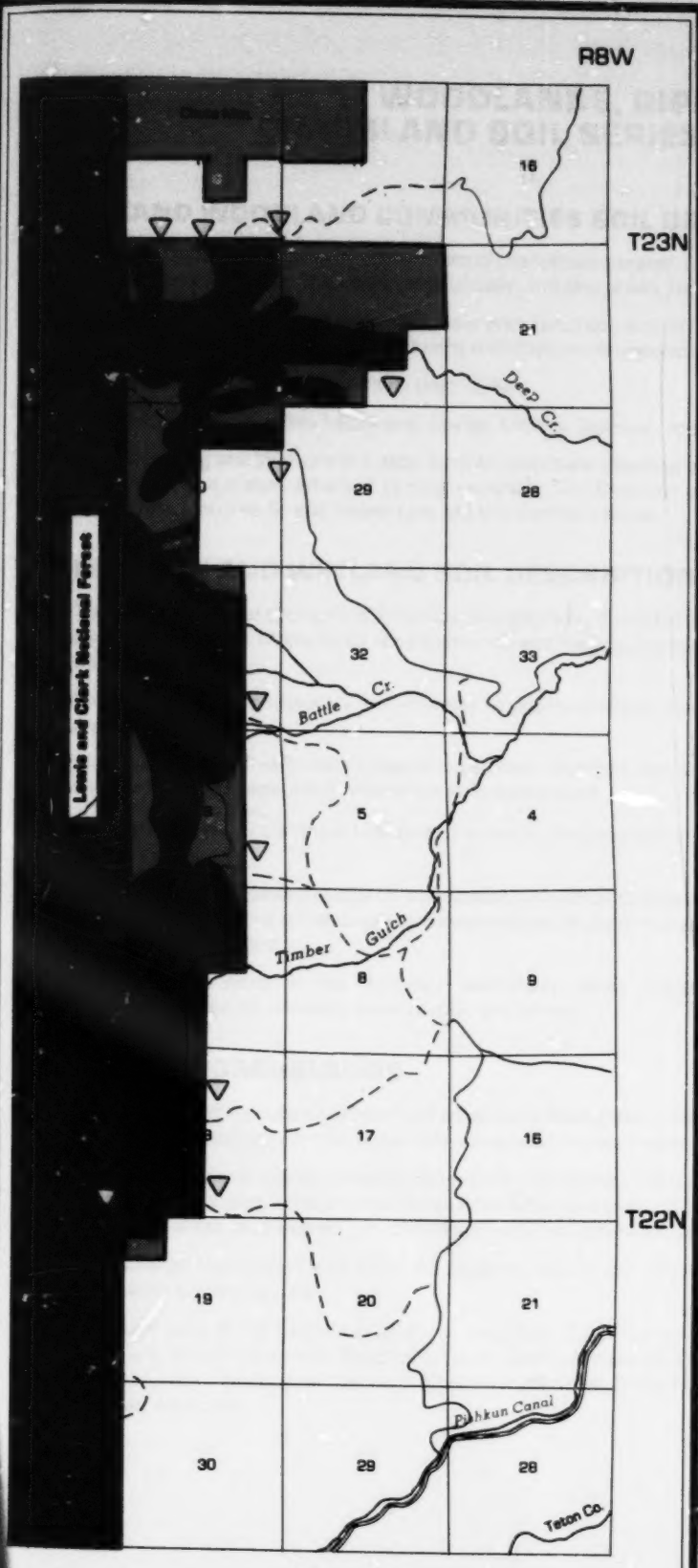
Chute Mountain
Outstanding Natural Area

(closed to all motorized vehicles)

1:63,360

0 1 2 3 Miles
0 1 2 3 4 5 Kilometers

* No developments (including potential powerlines, pipelines, roads and trails resulting from existing mineral leases) will be allowed in slope and riparian avoidance areas.



Deep Creek/ Battle Creek

Outstanding Natural Area

Figure 13. Avoidance Areas and ORV designations.

ONA Area
(closed to all motorized vehicles)

State/Private

Forest Service

Private Roads/Trails
(need landowner permission)

Public Roads/Trails

Riparian Avoidance Area*

Slope Avoidance Area*

* No developments (including potential powerlines, pipelines, roads and trails resulting from existing mineral leases) will be allowed in slope and riparian avoidance areas.

ONA Boundary Sign
(closed to all motorized vehicles)

Informational Sign

#128 — Deep Creek — Biggs Creek Trail USFS

NORTH

0 1 2
0 1 2 3

1:63,360

Supplement 1: WOODLANDS, RIPARIAN, WETLANDS, AND GRASSLAND SOIL SERIES DESCRIPTIONS

UPLAND WOODLAND COMMUNITIES SOIL DESCRIPTION

These areas are dominated by one or more of the following trees: Douglas-fir, limber pine, lodgepole pine, subalpine fir, and Engelmann spruce. The understory usually contains grass, forbs, and shrubs and small grassland parks.

The soils range from very shallow soils near rock outcrops and on convex ridges to shallow and moderately deep soils on slopes of hills. These well-drained loamy and clayey soils generally have more than 35% rock fragments throughout.

Slopes range from about 8 to more than 60%.

The major upland woodland soils are: Garlet, Loberg, Starman, and Whitore series.

Garlet, Loberg and Whitore are deep soils on mountain sideslopes; whereas the Starman soils are on convex slopes and along ridge crests adjacent to rock outcrops. The Starman soils are shallow (10-20 inches) over limestone or sandstone. Douglas-fir and limber pine are the common trees.

RIPARIAN AND WETLAND SOIL DESCRIPTIONS

These areas consist primarily of American sloughgrass, Columbia needlegrass, mannagrass, tall reedgrass, and other sedges and rushes. Major forbs are penstemon and Ranunculus spp. Shrubs include chokecherry, dogwood, cinquefoil, willow, and aspen.

Soils range from moderately well-drained to poorly-drained, deep, loam soils with sandy and gravelly soils along drainage coarses.

Slopes are mainly 1-4% with meandering stream channels across the floodplain areas. The water erosion hazard is slight when good vegetation ground cover is maintained.

The dominant soil occurring in the riparian areas is the Gallatin series. Depth to seasonal highwater table ranges from 36-60 inches.

The calcareous piedmont glacial till landscapes have small depressions (potholes) that accumulate runoff water from adjacent areas. There are also wet slumps on slopes of the mountains that support wetland vegetation. Springs occur in some of the slumps.

The amount of water in the "potholes" and slump areas varies as the precipitation and recharge increases or decreases based on intensity and duration of storms.

FOOTHILL GRASSLANDS

These communities consist primarily of a fescue/wheatgrass habitat type. Major forbs are: lupine, phlox, penstemon, larkspur, and western yarrow. Major shrubs are: shrubby cinquefoil, rose, and snowberry.

The associated soils are dominately moderately deep and deep (20 to 60 inches) with loamy textures. The percent rock fragments throughout the profiles varies from 5 to more than 35%. The soils are mostly well-drained, however, small depressed areas or areas on concave slopes may be somewhat poorly drained and wet for significant periods.

Slopes range from about 8 to 45%. As slope increases, and vegetation decreases, water erosion hazard increases from slight to very severe.

The major soils of the foothills grasslands are: Adel, Babb, Bynum, Cheadle, Dogby, Fifer, Hanson, Mord, Raynesford, Redchiefs, Starley, Starman, Shedhorn, Teton, and Tibson series. For detailed soil descriptions and interpretations for specific sites or landscapes contact: BLM field offices at Great Falls or Lewistown; or the Soil Conservation Service, Choteau, Montana.

Supplement 2: PUBLIC CRITIQUE OF ONA ACTIVITY PLAN ISSUES AND BLM RESPONSES

All public comments received on the proposed AP from the two public meetings (Great Falls and Choteau) and from individual letters have been categorized below. The categories are the six issues identified by the Team. No other issues were identified by the public either as personal responses or by comment at the public meetings. Responses to individual or group comments of like nature are prepared to acknowledge all comments.

LEGAL AND PHYSICAL PUBLIC ACCESS TO BLIND HORSE, DEEP CREEK AND CHUTE MOUNTAIN ONAS

What level of public access is appropriate in keeping with those outstanding natural values (Montana Wilderness Association)?

No access points are required (for Blind Horse) as hiking access exists from the south at Indian Head Rock trailhead, and from the north through the Blackleaf Game Range (Glacier/Two Medicine Alliance).

Access is important, for hiking, etc. (Ray Williams).

No access helps preserve wildlife (Ken Sinay).

Access would destroy hunting guide business and destroy fragile area. It would encourage horses and numerous foot hunters (Dick Klick).

In 1965 there were about 2,000 mule deer on the ONA areas, today there are about 150. This is due to uncontrolled public access during hunting season (Al Hass).

Results of increased public access will be to cut hunting season to 3 weeks. Over-exploitation is the problem (Al Hass).

Non-accessibility is what makes it great country. The narrow band of ONAs won't take the proposed public pressure (Dick Klick).

Does BLM allow E. Newman access to his private 160 acres in the Blind Horse ONA?

The Ear Mountain ONA is open enough that internal trail development should not be necessary.

Apparently some confusion exists as to whether there is a public right-of-way across the Salmond ranch into the Chute Mountain ONA. This should be checked with the Teton County Commissioners.

RESPONSE

Montana BLM will pursue access acquisition on a prioritized basis. Currently, there is no legal or physical access to the Blind Horse, Chute Mountain and Deep Creek—Battle Creek ONA from the east. As a result these areas are enjoyed exclusively by the adjacent landowners bounding the ONAs eastern borders. The BLM believes that since these lands are public lands, they should be accessible to all publics.

Instruction Memorandum MT-88-117, Montana Mission Statement from the White Paper on Access states: "the BLM will capitalize, when appropriate, on easements acquisition for in-place roads constructed for other uses, and will actively and accurately disseminate existing and updated information on public lands access opportunities via maps and signing of the BLM road net. Access will be conscientiously managed to ensure multiple-use goals. Achievement of these objectives will occur through balanced use of exchanges, rights-of-way acquisition, grants, cooperative public/private management programs, or any other process that works."

Access is defined as the physical ability to reach a particular place or area or the permission to do so. For the public to legally have access to public land, it must have both a physical way to get there and permission. The BLM must obtain easements for the type of physical access needed.

For the purposes of this Activity Plan, access is needed only to the boundaries of the ONAs. The ONAs are closed to all motorized equipment, including vehicles, so interior motorized access is not permissible. The BLM goal is to get the public to the boundary, establish parking areas, and allow them to enjoy these areas on foot/horseback.

TO WHAT EXTENT SHOULD SEISMIC EXPLORATION BE ALLOWED IN THE ONAS?

Consider whether any oil and gas exploration should be allowed prior to a decision on wilderness by Congress (Montana Wilderness Association)?

No seismic or oil/gas exploration should be allowed (Glacier/Two Medicine Alliance).

Seismic exploration should definitely be allowed in the ONAs (W. M. Vaughey).

We believe the Bureau should permit seismic activities to occur within the ONAs (Exxon).

Would prefer not to see any or at least reduce number of seismic (actions). Minimize all geo-type exploration with wildlife as primary concern. Impacts on wildlife from seismic testing goats and sheep (Ken Sinay).

Would BLM allow exploration on areas with No Lease?

Why would anyone want to do seismic if they can't drill in there (ONAs) (Doug Ablin)?

The RMF ONAs are important grizzly bear use areas. Any seismic activity should be carried out in such a way to avoid conflicts with grizzly bear and other wildlife use. Seasonality of seismic activity should be controlled and closely monitored (TNC).

We strongly support continued seismic activity in the front range area in order to fully ascertain the degree of oil-gas potential for future exploration purposes (Texaco).

RESPONSE

There are various concerns and questions relating to the issue of seismic exploration in the outstanding natural areas. The Headwaters RMP/EIS does not adequately address seismic exploration in these areas. Since the Final RMP/EIS was released in 1983 and the Record of Decision in 1984, the BLM has allowed some seismic exploration in the ONAs. This activity was done by helicopters and porta-drills and surface blasting.

Seismic activity has been allowed in the past with some stringent stipulations attached to the project, i.e., timing windows, minimum spacing distances between concurrent lines, minimum altitudes of aircraft, etc. (see Interagency Rocky Mountain Front Wildlife Guidelines). Because there is no specific guidance in the Headwaters RMP/EIS, we have been addressing seismic activity on a case-by-case basis.

This Activity Plan will address seismic proposals in a specific manner and address general and specific guidance to be applied to seismic operations in the ONAs. The question is not whether or not seismic activity will be allowed, but how the BLM can permit seismic activity with the least disruptions to scenic and surface values present in the ONAs. Seismic can only be considered within the context of non-motorized actions in that the HRMP closed the ONAs to motorized equipment. We intend this Activity Plan to provide clear guidance for an oil-gas operator to follow, allowing the seismic exploration while maintaining the environmental values characteristic of these ONAs.

WHAT TYPE OF RESOURCE DEVELOPMENTS SHOULD BE ALLOWED WITHIN THE ONAS?

Too much human development tends to screw things up (Ken Sinay).

No garbage areas (should be allowed) (Ken Sinay).

No highly developed sites (are recommended) (Ken Sinay).

In order to preserve the primitive qualities, no trail (internal) development would be desirable (Glacier/Two Medicine Alliance).

Any improvements that adversely affect the natural values of these ONAs should not be permitted. The reasons these ONAs were created should be held foremost in the consideration of any planned activities. Firewood harvest should be prohibited (TNC).

RESPONSE

The various public comments received on this issue cumulatively recommend that no garbage collection points, no internal trail development, or any improvements that adversely affect the ONAs wildland values (wildlife, scenic, recreation) for which they were designated should be allowed. The development of livestock control facilities are examples of "improvements" which may or may not be contrary to the ONA objectives. This Activity Plan will identify and resolve conflicting resource uses while tempering the end products with the RMP direction (the ONAs are) "to be managed essentially as wilderness."

These public opinions correlate with the ONA objectives identified in the Headwaters RMP (1984), and agree with the BLM resource management objectives to retain the wildland values that make these Outstanding Natural Areas by not allowing degrading activities.

SHOULD OVERNIGHT CAMPING BE ALLOWED ON THE ONAS?

Overnight camping and hiking should be allowed (Glacier/Two Medicine Alliance).

Would prefer to see no camping facilities (Ken Sinay).

Don't think you are going to get any day-use. How would you be able to enforce it and stop them (Re: overnight camping) (Dick Klick)?

Recreational day use would be preferable because of the low impact it would have on the areas.

If overnight camping is allowed it should stress minimum impact methods (no fires, no disturbance of vegetation).

Horse camps should be prohibited (TNC).

RESPONSE:

The four ONAs are relatively small in comparison to other adjacent public areas, and are separate federal wildland units adjacent to Forest Service and private land with high value resources. Recreation day-use only may be desirable and necessary for some parts of the ONAs. Human disturbances will be limited or excluded in areas that are sensitive wildlife habitats (prime spring reproduction areas, critical winter ranges). Selected ONA resources and locations can not accommodate frequent or extended human use. Examples are: streamside environs, springs, riparian stringers, seasonal wildlife reproduction habitats, raptor nesting territories, meadows, thin/fragile soils, slopes over 10 percent (roads, trails), etc. Extended human use or intrusion of such areas is incompatible with the critical wildland values for which these ONAs were established.

Overnight camping is a necessity for the use of some ONA areas. It produces products of human recreation use such as garbage, exclusion/displacement of wildlife populations, increased risk of wildfire, increased devegetation of frequently-used sites, and increased potential for water pollution.

Management (enforcement) can be achieved through public information (signs, literature) distribution, and agency staff contact with the user public. These activities are expected to provide the essential public use management of the ONAs, permit overnight camping on selected ONA areas, and retain/improve the ONA resource values

In summary, the AP has identified environs limited to day-use and those which can accommodate overnight camping. These will be monitored and evaluated to assure continuation of ONA values or improvement thereof.

HOW WILL NOXIOUS PLANTS BE CONTROLLED?

Weed control is very important (Ray Williams).

Does BLM have finances available to address noxious plants problems?

The weed control portion of the Activity Plan should stress inventory, prevention, and a true Integrated Pest Management approach. Chemical control should be used only when other methods have proven ineffective. If chemical control is necessary, hand application directly to target species should be the method used. Should small areas of infestation be discovered, efforts should be geared toward eradication (TNC).

RESPONSE:

BLM has a legal responsibility under current policy to administer some degree of noxious plants control/eradication either independently or in cooperation with various county or state agencies. Noxious plants on the ONAs are of considerable concern to BLM, and will be addressed as an issue in this Activity Plan with the objective of identifying noxious plant problems areas and a program of control/eradication.

HOW TO CONTROL WILDFIRE? SHOULD PRESCRIBED FIRE BE PERMITTED FOR WILDLIFE HABITAT AND LIVESTOCK FORAGE IMPROVEMENT?

Wildfires should be allowed to burn as long as they do not threaten adjoining private land and are compatible with ONA management guidelines (TNC).

Prescribed fire is a valuable management tool and should be used where appropriate to achieve ONA management objectives (TNC).

RESPONSE:

The BLM will continue to provide fire control during the first burning period of all wildfires on or threatening public land until the 1978 Normal Fire Year Plan is updated (Headwaters RMP/EIS, 1983, Final).

Under current agreement, the US Forest Service has fire control responsibility in the area.

Modified suppression areas may be established when the Normal Fire Year Plan is reviewed, based on consideration of the following criteria: values at risk; fire behavior; fire occurrence; beneficial fire effects; fire suppression costs; and consistency with other agency plans, and policies.

This Activity Plan will provide the BLM with specific guidance to be incorporated into the updated Fire Plan (late 1988/early 1989). Current guidance allows for the use of heavy equipment for fire suppression. The updated Fire Plan may or may not continue with this policy.

Specific guidance may or may not include "let burn" areas. This may include initial attack on wildfire, however, aggressive control may not be taken unless there is threat to loss of private property.

Prescribed burning may continue to be used in support of resource management objectives, such as range improvement. It will not be used to improve one resource at the expense of another. For example, prescribed burning on rangeland would be designed to achieve both wildlife and range objectives. Soil, vegetation, water quality and quantity, recreation, and scenic values and data will be evaluated prior to any prescribed burning to assure that the effort results in wildland resources enhancement.

Prescribed fire would not be permitted in habitat for threatened and endangered species (plant and animal) that would jeopardize the continued existence of such species. It may be possible to enhance T&E species habitat with prescribed burning.

Fire management planning and fire suppression will be coordinated with federal, state, and county fire suppression agencies.

NO-LEASE OF CENTER CORE AREAS OF THE ONAS

Although this subject has adequate management direction from the HRMP, the BLM received several letters from the oil-gas industry concerned with this policy. We felt BLM needed to respond to their proposition that we reconsider leasing the No-Lease core areas through designation as No Surface Occupancy (NSO).

The Headwaters RMP/EIS provides guidance for attaching special stipulations to leases at the time of issuance to protect seasonal wildlife habitat and/or other sensitive resource values. In highly sensitive areas, where special stipulations are not sufficient to protect important surface resource values NSO stipulations can be attached to the lease (page 13, HRMP, Final).

The four ONAs along the RMF are considered highly sensitive areas based on their wildlife, scenic and recreational values (page 7, HRMP, Final). The effects of ONA designation are similar to the effects of wilderness designation; however, this designation provides less secure protection because it is an administrative decision, not legislative.

Based on this guidance in the HRMP, the NSO stipulation has been attached to the outer borders of the ONAs. The BLM could have made, based on resource values, the entire ONAs NSO. However, based on the premise that oil-gas resources over a half-mile from a drill site probably can not be drained, the BLM felt it was prudent to not lease the cores of the ONAs, thereby not leasing an area a lease-holder could not "enjoy."

For the BLM to change this policy would require a planning amendment to the RMP. At this stage in our planning process, we are only preparing an Activity Plan based on the general guidance in the RMP. Consequently a planning amendment is not appropriate at this time. However, when the RMP cycles for maintenance or amendment, this issue may be re-evaluated.

COMMENTS BELOW ARE NOT IDENTIFIED WITH ANY OF THE ABOVE ISSUES

The listed areas should not become wilderness (Ray Williams).

Should be guarded (excluded?) as far as powerlines, pipelines, and dwellings (Ray Williams).

Since all the ONAs are in prime wild game areas and joining Fish and Game wildlife reserves, it seems they should all be given wilderness status (Alice Gleason).

How will management of the Rocky Mountain Front ONAs aid in the recovery of threatened and endangered species (Mont. Wild. Assoc.)?

We believe that the outstanding wilderness qualities of the Blind Horse ONA should be protected and maintained intact (Glacier/Two Med. Alliance).

ORVs should be prohibited in this area (Glacier/Two Medicine Alliance).

Ear Mountain itself is a sacred area to the Blackfeet Indians (Glacier/Two Medicine Alliance).

We encourage you to recommend wilderness for all of the BLM ONAs on the Front (Glacier/Two Medicine Alliance).

Development of the petroleum potential by the drilling of wildcat tests and the production of any oil and gas intercepted should be allowed within the ONAs (W. M. Vaughey).

We feel it may be appropriate for the BLM to re-evaluate the Headwater RMPs no-lease recommendation for the central portions of the ONAs in favor of offering leases, even if they are no surface occupancy leases (Exxon).

We are concerned about these areas being buffer zones around the FS Wilderness Areas (Albert Carlson).

Can anyone nominate an ACEC or ONA at any time (Dick Klick)?

We are concerned that access is needed for essential county services such as ambulance or fire (Albert Carlson).

Would BLM allow a road through the ONA specifically between T. 8 and 9 N. (George Hodgekiss)?

If the FS wants to cross the BLM (ONAs) to drill a well on FS lands, would BLM let them (Doug Abeline).

Can we (BLM) modify our NSO so only a wellhead could be in there with remote monitoring outside the ONAs (Dave Neibauer)?

What would BLM do if someone got production in an area off the ONAs, and wanted to unitize the oil and gas development to include the ONAs, thereby allowing full field development? Burger gave potential answer.

What is the BLM policy of oil-gas leasing on adjacent private land?

Will oil-gas leases in the ONA core areas be reoffered upon expiration? No (Dave Neibauer).

Who or why can BLM dictate action on private land (Dick Klick)? NEPA and courts require that federal actions on split estate be treated as though it is entirely federal.

Wilderness groups are supportive of the ONA proposals (Dick Klick).

It is important that this Activity Plan be objective (issue) driven and that any proposed activities within the ONAs be analyzed in relation to these objectives.

Any proposed activities that will have an effect on the natural values of these ONAs should go through the Environmental Assessment process.

The potential effects of the Activity Plan on endangered and threatened species should be evaluated (USFWS).

The special designation (ONA) of acquired public lands should benefit listed species in the long-term (USFWS).

To assist you (BLM) in coordinating multiple-use activities that minimize or avoid adverse effects to various wildlife species we recommend applying the guidelines developed under The Interagency Rocky Mountain Front Monitoring and Evaluation Program (USFWS).

We believe it is critical that the BLM allow access to these four ONAs for purposes of oil and gas exploration and development opportunities, particularly in light of the dwindling land available for such uses (RMOGA).

We strongly urge BLM to continue leasing the lands contained in the ONAs with reasonable lease stipulations which still allow surface occupancy (RMOGA).

We recommend that the BLM apply the minimum legal standards for protection of these areas which will adequately safeguard sensitive resource values while allowing industry the opportunity to explore for, and possibly develop, oil and gas resources (RMOGA).

We do not believe it is necessary to withhold portions of the ONAs from oil-gas leasing or seismic activities because the BLM has at its disposal numerous mitigation measures which will provide for adequate protection of the existing resource values (RMOGA).

Texaco believes that this entire front range area should be managed for "multiple use" including oil and gas development (Texaco).

It is extremely important that public lands which are not designated wilderness, continue to remain open to oil and gas exploration (Texaco).

If BLM finds it absolutely necessary and justified to use NSOs we believe that a procedure should be established by the BLM for waiving these stipulations in specific cases and in limited geographical areas with high oil-gas potential.

Supplement 3: ACTIVITY PLAN PREPARATION TEAM

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PUBLIC PARTICIPATION-COORDINATION

About 73 copies of the Coordinated Activity Plan proposal and associated data were sent as an informational brochure to various conservation groups, public agencies, private industry, and private citizens on February 3, 1988. A meeting was held with Teton County Commission staff and some commissioners February 11, 1988. The purpose was to apprise the Commission of the Activity Plan objectives, and to hear the Commission's views and concerns, if any.

Two public information dissemination and opinion collection meetings were held February 23 and 24, 1988, at Great Falls, and Choteau respectively. About 40 private citizens and public agency personnel were in attendance. Comments, oral and written, were received and can be found in Supplement 2 of this AP.

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FINAL

Outstanding Natural Areas of the ROCKY MOUNTAIN FRONT RANGE

ENVIRONMENTAL ASSESSMENT

For the Coordinated Activity Plan

FINAL ENVIRONMENTAL ANALYSIS

Public Letters and Comments re: Draft 4
BLM Responses to Public Letters and Comments 4
Public Participation Paragraph 36

INTRODUCTION

The purpose of this environmental assessment (EA) is to analyze the activity plan (AP) management prescriptions for the four Outstanding Natural Areas (ONAs) designated by the Headwaters Resource Management Plan (1984)(HRMP).

Since this Final EA consists of the public comments received on the Draft AP/EA and the BLM responses to those comments, it would be to the reader's convenience to refer to the Preferred Activity Plan in the Draft for more specific information and discussion than is presented here.

This EA was prepared by the individuals shown on supplement 3 of the preceding AP.

BLM RESPONSES TO PUBLIC COMMENTS ON THE DRAFT ONA AP/EA

The following are the BLM's response to the public comments received on the draft ONA AP/EA. The responses received cover comments from 16 persons or groups.

Douglas J. Burger
Great Falls Resource Area, BLM

September 1, 1988

re: RMF ONAs Activity Plan, July 1988

Dear Mr. Burger:

Before commenting on the substance of this document, I want to express some frustration with trying to understand it. I presume it is a "draft" proposal, and that a decision to implement a final plan (that responds to comments received on this draft) will be forthcoming. If so, it would be nice to state that explicitly. It would also be nice to include an address for where comments should be sent. The "Avoidance area and ORV designations" maps are very confusing - I really don't know what ORV-use information they show. Finally, it appears that many of the elements in the "No Action" and "Preferred" alternatives are very similar; it would be nice to have a table that compared the differences between the two. 1

Regarding the substance of the AP, I'm generally favorably impressed with your "preferred" alternative. I'm a little suspicious of the wildlife and range management sections; I wonder if the amount of management proposed will actually be consistent with the HRMP direction to manage the areas "essentially as wilderness". But I think that most of the direction is not only consistent with the HRMP but also is a fairly conservative expression of it. I certainly applaud the minor tightenings of ORV use restrictions. 2

My one major objection to the preferred alternative for the AP is the acquisition of road access to the ONA boundaries. I think that such access would significantly degrade security for wildlife, would exacerbate the noxious weed problem, and would lead to motorized trespass. I agree that providing access for the public is a reasonable and fair goal. The key is to provide access for the public, and not for their vehicles. You should plan to acquire, by condemnation if necessary, easements across private land to the ONA boundaries for foot and recreational stock traffic only, and not for motor vehicles. Such access would not have the significant negative impacts that would accompany access for motor vehicles. 3 4

Sincerely,

Cedron Jones

Cedron Jones
940 Wilder
Helena, MT 59601

AM
SLUS
SPE
WMB
RS
FC
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Bureau of Land Management
Great Falls District
RECEIVED
SEP 6 1988
Great Falls, Montana

1

Many of the elements in the "No Action" and "Preferred" Alternatives are similar. The objectives of an activity plan are to provide specific management guidance not given in an RMP/EIS. Consequently, if the management direction given in the RMP/EIS is currently being followed and is providing good, sound guidance, it is included in all alternatives and is incorporated into the overall, specific management policy necessary for an activity plan. It is in these areas that similarities will exist.

2

The management policy proposed in the Preferred Alternative is consistent with the HRMP guidance to manage the ONAs "essentially as wilderness." This activity plan does not change the management direction given in the HRMP, but does provide more specific direction as to what will and will not be allowed and if a use is to be allowed, to what limit. This direction allows BLM to permit certain activities while maintaining those qualities that are characteristic of these Outstanding Natural Areas.

3

It is true that additional road access to the ONA boundaries which create soil disturbance, may create more opportunities for rapid spread of noxious plants.

Noxious plant control and monitoring will be a high priority item. Integrated Pest Management will be used to control noxious plants.

Harvest is generally the most important wildlife management tool available for ungulate species. If ungulates (e.g., deer, elk, sheep) are "too secure" and allowed to increase beyond carrying capacity to the point where they are "eating themselves out of house and home," their home/habitat may be significantly damaged. To return this habitat to its former productive state would take a much longer time than it would take for an over-harvested population to replenish itself on undamaged habitat conditions. Deer, the principal ungulate on ONAs, have tremendous capacity to reproduce on good habitat, with the female segment usually producing two fawns. BLM-administered land (ONAs) under present access conditions for hunters, combined with very little hunting allowed on significant portions of private land, have resulted in very few opportunities for professional wildlife managers to control harvest levels. If access is increased, harvest can be controlled by type of season to reflect lowered wildlife habitat security levels.

4

The ONAs are "closed" to motorized vehicle access as stated on page 32 of the final HRMP. The public has the right to enjoy the public land. It is not unreasonable for the public to drive to a fenced parking area or trailhead adjacent to the boundary and enjoy that public land. A fenced parking area or trailhead with informational signs will allow BLM to more easily direct the public to BLM-administered land and will help lessen the conflicts between the recreationists and adjacent private landowners. BLM will also be able to more easily monitor public use of this public land through designation of specific access routes and trailheads.

2

Valerie L. Larson
Box 840
Chateau, Mt. 59422
467-3121

TO: DRAFT ROCKY MOUNTAIN FRONT OUTSTANDING NATURAL AREA ACTIVITY PLAN

BLM AREA OFFICE
812 14TH STREET NORTH
GREAT FALLS, MONTANA 59401

Sept 1, 1988

RECEIVED
SEP. 6 1988

SIRS;

I AM WRITING TO SAY THAT I, AND MY FAMILY, AND AT LEAST 95% OF THE PEOPLE I HAVE TALKED TO ARE UNALTERABLY OPPOSED TO YOU AND YOUR "PLANNERS" LATEST ATTEMPT TO INTERUPT AND TRESPASS UPON AND IN THE BUSINESS AREAS OF THE FOLKS WHO HAVE CHOSEN TO MAKE THEIR LIVING BY LEGIMATELY OWNING LAND, AND PRODUCING GOODS AND SERVICES DERIVED FROM THE OWNERSHIP OF SUCH PROPERTY. BECAUSE YOU, IN YOUR WISDOM, HAVE BEEN ABLE TO MAKE YOUR LIVING BY USING OTHER PEOPLE'S LAND, AND THERE-BY ESCAPING ANY RESPONSIBILITY FOR YOUR DECISIONS, INRE, WHETHER OR NOT THOSE DECISIONS HAVE INDEED PRODUCED ANYTHING WORTH SELLING, I CAN UNDERSTAND WHY YOU FAIL TO UNDERSTAND WHY ANY LANDOWNER COULD OR SHOULD OBJECT TO THE "PUBLIC" "RIGHTS" OF INGRESS, EGRESS ACCESS OR ANY OTHER "CESS".

5

I AM IN THE PROCESS RIGHT NOW OF ORGANIZING MY GROUP OF "COUNTRY DWELLERS" WHO WILL BE ABLE TO VISIT THE MISSOURI RIVER BY TAKING THEIR ACCESS THROUGH THE TRIBUNE BUILDING IN GREAT FALLS. IF THEY CAN SUPPORT GOING THROUGH MY PLACE OF BUSINESS TO HAVE THEIR "KICKS", THEN WE TOO, SHALL HAVE THE RIGHT TO GO THROUGH EVERY PLACE OF BUSINESS, PRIVATE OR PUBLIC IN GREAT FALLS TO GET OUR "KICKS".

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AND WHILE WE ARE ON THE SUBJECT OF PUBLIC OWNERSHIP AND RIGHTS, I AM ALSO DEMANDING MY RIGHT TO FREELY USE ANY AND ALL PUBLICLY OWNED PROPERTY, SUCH AS THE REST ROOMS IN THE FEDERAL BUILDING, PICNICS IN THE MEETING ROOMS OF THE FISH,WILDLIFE AND PARKS BEAUTIFUL HELENA HEADQUARTERS, ALL OF THE FOREST SERVICE OFFICES, ETC. IT WILL BE VERY NICE TO BE ABLE TO COME INTO AND FEEL FREE TO USE ALL THE EQUIPMENT YOU FOLKS HAVE, BECAUSE IT REALLY BELONGS TO "THE PUBLIC".

IN CLOSING, GET SMART--USE THE COMMON SENSE YOU WERE BORN WITH. IF YOU KILL THE GOOSE THAT LAYS THE GOLDEN EGG, WHERE WILL YOU GET BREAKFAST.

THE BUREAUCRATS OF TODAY ARE THE SAME AS THE MINING AND CATTLE BARONS OF THE LAST CENTURY. HAVING FUN AND MAKING THEIR FORTUNES ON THE BACKS OF THE LAND AND THOSE WHO COME AFTER THEM. THE NEXT CENTURY WILL PROVE THAT RAPING THE LAND CAN BE DONE IN THE NAME OF CONSERVATION, PRESERVATION, RECREATION.

Valerie L. Larson

5

The BLM has no intention of interrupting or trespassing on the lives of landowners adjacent to the ONAs along the Rocky Mountain Front. The BLM believes that acquiring access to the BLM-administered land will lessen burdens on private landowners by directing recreationists to the BLM-administered land and away from private land, thereby lessening the chances of trespass.

3

Bureau of Land Management
Great Falls Resource Area
RECEIVED
SEP 21988
Great Falls, Montana

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8HO

SEP 1 1988

Douglas J. Burger
Great Falls Resource Area Manager
Bureau of Land Management
P.O. Box 2865
Great Falls, Montana 59401

Re: Rocky Mountain Front
Outstanding Natural Area
Activity Plan/Environmental
Assessment

Dear Mr. Burger:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency has reviewed the above referenced Environmental Assessment (EA). The Preferred Alternative has obvious advantages over the No Action Alternative with regard to regulating activities within the Outstanding Natural Resource Areas. The extent that enhancement of public access is beneficial will depend heavily on the implementation and management process. Caution should be exercised to ensure that the increased access opportunities are consistent with managing these areas "essentially as wilderness".

6 The Monitoring and Evaluation Section does not meet the stated objectives for watershed and air quality. Baseline water quality data should be obtained as early as possible. This will establish the existing conditions at the time of this management decision. If human developments or emergency conditions do not occur within 5 years of the baseline monitoring, the monitoring sites should be re-sampled to document any changes. This approach allows a more realistic assessment of the impacts from emergencies or development activities. This will also permit validation or correction of management decisions.

7 A basic monitoring plan should be established to outline the minimum requirements for adequate evaluation of emergency situations. A description of the feedback loop and procedures for incorporating monitoring results into management decisions should be included. It is presumed that any proposed oil and gas leases or mining developments will require similar plans and will be subject to NEPA review. The benefit/cost analysis for the preferred alternative supports the expenditures necessary to acquire adequate monitoring and evaluation data.

We would like to receive a copy of the final EA, environmental monitoring plan, and Record of Decision. If EPA can be of further assistance, please contact Dick Montgomery or me at (406) 449-5486 or FTS 585-5486.

Sincerely,

Lee Shanklin
Environmental Scientist

6 and 7

We concur that air quality monitoring is needed in the area to establish a baseline for H_2S and SO_2 particulates. Such monitoring would also show any elevated levels resulting from oil and gas development in the area. When acceptable levels have been exceeded, management actions would be triggered to rectify the pollutant problem. This monitoring program should be a cooperative effort between the BLM, State of Montana Air Quality Bureau, the Environmental Protection Agency, and Forest Service. The goal of the monitoring program will be to establish a pollutant level baseline and monitoring of pollutant levels. A real time continuous (RTC) total suspended particulate (2TSP) sampler would cost approximately $2,000. RTC H_2S and RTC SO_2 samplers would cost approximately $4,000 each. Installation and testing of the three components would cost $3,000-$5,000, depending on the type and level of data acquisition required. Annual operating costs for the three components would be about $1,500/year. Some cost efficiencies can be achieved by using BLM or State of Montana personnel to install and test the equipment, use leased equipment, or use equipment of less than RTC quality.

This monitoring program will be initiated by the BLM with other agencies upon completion of the ONA Activity Plan, and is expected to result in a multi-agency memorandum of understanding, and cooperative funding commitments. The potential for oil and gas developers to participate by contributing funds will also be reviewed.

This monitoring program would be coordinated with the BLM intermittant facility monitoring for elevated H_2S/SO_2 levels pursuant to the BLM oil and gas inspection and enforcement program. Any pollutant levels which exceed standards will result in immediate corrective actions.

Page 37, paragraph 1, second sentence delete entire sentence and replace with: "Baseline water quality monitoring will be done in the ONAs where no data exists to the extent that manpower and budget constraints permit. The baseline data will be collected for a minimum of five years."

4

Texaco USA

September 3, 1988

Re: Outstanding Natural Area
Activity Plan/Environmental Assessment
Teton and Lewis & Clark Counties, Montana

Mr. Marv Hoffer
Team Leader
Great Falls Resource Area
Bureau of Land Management
215 First Avenue
Great Falls, Montana 59403-2865

Dear Mr. Hoffer:

The BLM has asked for comments regarding the above captioned activity plan. Texaco submitted written comments on March 3, 1988, a copy of which is enclosed. Texaco believes that the entire front range area has high oil and gas potential and that the current restrictions make it extremely difficult, if not impossible, to develop that potential.

Very truly yours,

TEXACO INC.

Terrence M. Belton
Land Department
Western Region

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Oil and gas development restrictions in the ONAs resulted from the Headwaters RMP (July 1984). The ONA Activity Plan cannot and does not change oil and gas lease stipulations nor does it open areas that were closed to leasing by the RMP. These restrictions are only being applied where other stipulations are insufficient to adequately protect public resources. Leases issued prior to the RMP have valid existing rights and could be developed. Pre-RMP leases with valid existing rights exist only in the Blind Horse ONA.

5

MONTANA PUBLIC LANDS COUNCIL

P. O. BOX 1679 — HELENA, MONTANA 59624

Phone (406) 442-3420

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GAYNARD SMITH ..... ELDA
MARK STEVENS ..... ASHLAND

September 13, 1988

Mr. Douglas J. Burger
Bureau of Land Management
Box 2865
Great Falls, Montana 59401

SEP 15 1988

Dear Mr. Burger:

The Montana Public Lands Council would like to comment on the Rocky Mountain Front Outstanding Natural Area Activity Plan/Environmental Assessment.

We support the preferred plan outlined in the AP/EA, but would like to make a few comments.

On page ii of the summary, livestock regulation is mentioned often. We feel a better term to use would be management instead of regulation. We are encouraged to read that livestock will be used to enhance riparian areas. We hope that your agency will look at riparian areas as part of an entire pasture, not as the focal point of the allotment. The State Director has repeatedly assured our membership this would be the case in allotments with riparian areas.

On page 29, under lands access, we are very concerned with the possibility of the use of condemnation to achieve access. We realize a willing buyer-willing seller arrangement will be attempted in all cases. However, the use of condemnation will not benefit either party.

On page 31, under administrative access, it is noted that cross-country travel would not be authorized. We feel this is too restrictive on a livestock permittee when it becomes necessary to take care of either his allotment or his livestock. Sick cattle will not be conveniently by a road or trail or the time. Fences are often located cross-country as are springs, pipelines, salting area, etc. To restrict this maintenance to road or trail travel is not very realistic in our opinion.

We would like to thank you for this opportunity to comment.

Sincerely yours,

Kim Enkerud

Kim Enkerud
Natural Resource Coordinator

KE:ejr

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It is BLM policy to protect riparian areas which are part of a livestock allotment management plan area and not fencing to exclude riparian habitat as separate management units. Smaller exclosures are occasionally established for riparian study purposes or demonstration areas. Such areas are not management units but are simply study plots used to compare them to the grazed pasture.

10

A "willing buyer-willing seller" arrangement to achieve public access will be pursued in all cases. BLM has other tools for acquiring access, such as: land exchanges; direct purchase of land or land rights; long-term public access land use agreements; or as a last resort, condemnation. All efforts to acquire access, with an agreement that is equitable to all parties involved, will be exhausted before condemnation is used.

11

Cross-country travel by the general public or by livestock lessees will not be allowed as common practice in the ONAs. Cross-country travel will be authorized by permit for livestock needs or range improvements maintenance which cannot be reasonably accessed by other means (i.e., horseback).

6

Bureau of Land Management
Lewistown District office
Airport Road
Lewistown, Montana 59457

September 2.1988

Dear Sir:

The Thursday September 1, 1988 Chouteau Acantha carried an article concerning the BLM's interest in seeking public access to "out-standing natural areas" between the Sun and Teton Rivers, particularly in the Deep Creek and Battle Creek areas. I am opposed to any BLM development in these areas since the May-June 1987 issue of Montana Magazine has identified the Deep Creek Battle Creek areas as possessing significant attributes for Wilderness designation.

12 While the BLM's intent to upgrade air quality classification from Class II to Class I is noteworthy, the potential for future and extensive oil and gas development is of far greater concern.

Therefore, I urge the BLM to abandon any plan to develop this area.

A response to the letter would be greatly appreciated!

Sincerely,

Timothy N. Calrahan M.A., J.D.
2108 8th Ave. West
Seattle, WA 98119
(206) 282-4893

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12

After the BLM-administered Deep Creek/Battle Creek ONA was inventoried for wilderness designation it was recommended as unsuitable for wilderness designation in May 1983. The area was designated as an ONA by Record of Decision in July 1984, by the Headwaters Resource Management Plan.

The HRMP addressed oil and gas development in the ONAs. This activity plan does not change that direction. Of the approximately 13,100 acres that comprise the four ONAs, 41% is not presently leased. Under either alternative: 48% of the Blind Horse ONA would be leased with No Surface Occupancy (NSO) and 52% will not be leased; 35% of the Ear Mountain ONA would be leased with NSO and 65% will not be leased; 41% of the Chute Mountain ONA would be leased with NSO and 59% will not be leased; and 88% of the Deep Creek/Battle Creek ONA would be leased with NSO and 12% will not be leased.

7

Bureau of Land Management
Lewistown District Office
80 Airport Road
Lewistown, Mt. 59457

September 2, 1988

Dear Sir or Madam:

13 As a Montana native and a frequent visitor to both the Bob Marshall Wilderness Area and the adjacent Lewis and Clark National Forest I am deeply distressed with the proposed road development into the Teton/Sun River area.

The status of this area was recently taken up by Montana Magazine (May-June 1987) where it was identified as having significant attributes for wilderness classification.

While I am in full support of additional public access to, and recreational use of, this area; I am none the less concerned that this is yet another thinly veiled attempt to open Montana's dwindling remote areas to oil and gas exploitation. The Sept. 1, 1988 issue of the Chouteau Acantha noted that the outstanding natural areas involved - while offering exceptional recreational aspects - also were in an area "thought to have high potential for oil & gas development".

This is a rare and fragile area and needs to be protected as such.

10

Any expensive and time consuming use of condemnation should be used to solidify the wilderness nature of this section of the Lewis and Clark National Forest - not deteriorate it.

14 Please consider consolidating your efforts in the direction of further wilderness classification for the Teton/Sun River drainages - and not increased development for other interests.

Thank you very much for your consideration in this matter.

Ronald R. Steff
6 Soldiers Field Pk. #404
Boston, MA 02163

13

The ONAs have either been leased with no provision for occupancy (NSO leases) or not leased. These decisions were made in the Headwaters RMP (July 1984) and cannot be changed, except by a RMP amendment.

Access to ONA boundaries is intended primarily for recreational use. Oil and gas leases with NSO stipulations within the ONA boundaries cannot physically occupy the surface within the NSO portions of those leases. Such leases can only be developed by directional drilling from an off-lease area. Developing access to the ONA boundaries will not encourage any more oil and gas development than that allowed under the leases at present.

14

Only three of the four ONAs were examined as wilderness study areas. This was determined by a final inventory decision in the Montana Overthrust Belt document in January 1980. The three WSAs were Blind Horse (MT-075-102), Chute Mountain (MT-075-105), and Deep Creek/Battle Creek (MT-075-106). Further intensive wilderness inventory analysis in the HRMP produced a non-suitable recommendation for wilderness in May 1983. The Record of Decision for HRMP in July 1984, finalized this recommendation and the three WSAs were no longer under interim protection and were no longer considered for wilderness designation. The ONA alternative was selected.

8a

GREAT BEAR FOUNDATION
P.O. Box 2699
Missoula, MT 59806
(406) 721-3009

September 13, 1988

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Mr. Douglas J. Burger
Area Manager
Great Falls Resource Area
USDI - Bureau of Land Management
P.O. Box 2865
Great Falls, MT 59403-2865

SEP 16 1988

Re: Access to the Rocky Mountain Front

Dear Doug:

We have reviewed the July 1988 Activity Plan/Environmental Assessment (AP/EA) [redacted] to BLM's Outstanding Natural Areas along the Rocky Mountain Front, and the related document describing BLM State Director Guidance on access. Thank you and your staff for preparing the AP/EA, and thank you for the opportunity to comment on proposed access to the Rocky Mountain Front.

15 We are uncertain at this time about the meaning -- if any -- of an Activity Plan/Environmental Assessment that is issued in the month prior to State Director Guidance, but are certain that the proposed access to the Front will add to the cumulative effect of many other developments that are jeopardizing the grizzly's existence in the Northern Continental Divide Ecosystem. We will take this access proposal into account with related issues as we proceed with our plans to request that the grizzly bear be listed as an endangered--rather than, at present, a threatened -- species in some of the remnant ecosystems of the western United States.

1. Background on the Grizzly Bear

Grizzly bears are a highly adaptable and intelligent species capable of thriving in a wide range of climates and habitats. They are direct descendants of bears that first reached North America with caribou, mountain sheep, other wildlife, and human beings when the Ice Ages lowered the oceans and exposed land that provided "bridges" between continent and continent. They first occupied the unglaciated portions of Alaska, but their presence spread as the ice sheets receded to uncover an expanding habitat that supported an expanding population of grizzlies and other species.

By the time white Europeans started exploring North America, grizzlies had moved into habitat as far east as Hudson's Bay and as far south as Mexico, thus establishing themselves as survivors in Arctic climates and southward to near-Equatorial climates. By then, there were as many as 100,000 grizzlies in what is now the lower 48 United States, with as many as 10,000 in California alone.

Board of Directors
Arnold Bolle • William Callaghan • Craig Campbell • Lance Olsen • Frank Pershour • Mart Williams

15

The draft ONA/AP (July 1988) was issued prior to the State Director Guidance on Access (August 1988). However, the objectives for access as discussed in the ONA/AP are in agreement with the State Director Guidance. The ONAs are in a retention zone and are a high (0-5 years) priority acquisition area as shown on the Land Pattern Adjustment and Access Map (available in the Great Falls Resource Area).

BLM is committed to analyzing the cumulative effects of all activities proposed on BLM-administered land along the RMF. Endangered Species Act Section 7 consultation is currently underway with the USFWS. BLM has committed to initiating formal consultation on all access routes when these routes are more precisely defined and state-of-the-art analysis tools are available (Appendix 5: Biological Assessment, page A-25, draft ONA/AP).

8b

When the European population began its own expansion into this same vast area, the grizzly began a sharp decline that continues today, just as the human population's occupation of the western United States continues today. Wherever numbers of humans have taken possession of land occupied by grizzlies, the bears have been nudged into eventual extinction. Therefore, the grizzly bear has become extinct on all but one percent of the habitat it once occupied, and is accordingly down to only one percent of former population numbers.

For these two general reasons (human occupation of grizzly habitat, followed by extinction of the bears in the areas inhabited by people), and because of their results (near-extinction of the grizzly in the entire American West), a number of national, regional, and state organizations and agencies recognized in the 1970s that the bear should be listed either as an endangered or a threatened species. After some debate, grizzlies were listed as a "threatened" species in the mid-1970s. They remain so-listed today, and are therefore eligible for protection under the federal Endangered Species Act (recently reauthorized by Congress) as well as by related laws such as FLPMA, NFMA, and NEPA. It is a comment on the current state of the world that such a fate has befallen such an adaptable and intelligent animal in the United States, once acknowledged as a world leader in wildlife conservation.

12

2. Background on Public Access to Public Lands

The issue of access to public land has become a hotly controversial one in very recent years. The divisive and politicized access debates of the 1980s are unprecedented. Many specific access-related controversies have high potential for reducing the existing spectrum of survival opportunity for wildlife, including bears, specifically including the grizzly bear. Part of this controversy arises because of federal plans to spend federal treasury funds in providing public access to formerly inaccessible areas. Many of these areas were simply not easily accessible rather than truly inaccessible, and so the matter is one of federal support of easy access rather than one of access per se.

Access has sometimes caused confusion for the agencies. For instance, the Forest Service has said that its roads are justified -- in part -- because roads provide access for firefighters when forests catch fire. But roads into the woods lead to increased risk that fire will start in the first place, simply by making it easy for careless campers and arsonists to go into the forest. Agencies also suffer frequent confusion in determining need for access. For example, the Gallatin National Forest claimed that easier access would be a benefit to grizzly bears because it would provide access needed by researchers. But GBF asked researchers if they did indeed need the proposed access, and they replied that they did not.

The public can also get confused about access. An anecdote can illustrate this confusion, so please permit me to share an experience I had several years ago, in Great Falls, when a hunter spoke in favor of roads at a public hearing on wilderness. This hunter said that he

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wanted the Forest Service to build more roads so he could use them for access to hunting. After the hearing, I asked him why he didn't just go hunting where roads already exist, since there are already thousands of miles of forest roads in Montana. He replied that hunting is not very good in those areas, and that he wanted to get into roadless/wilderness areas "where the game is." (This is a fellow who would cut his throat if he thought he might someday need blood for a transfusion.) Other hunters want roadless/wilderness areas kept intact, without easy access, as a way to protect the future of their hunting. The upshot is that easy access provided for some hunters comes at the expense of other hunters, and the same division of interests can exist among hikers, sight-seers, photographers, and others who are affected by access. Social divisiveness is thus an intrinsic consequence of the access issue.

This divisive characteristic of access has been most notable in recent years of "landowner versus the public" conflicts, which have been prominent in Montana and other western states. We will comment further on this recent, unnecessary, and unfortunate problem below.

Access is a social and/or psychological issue in that it makes people feel deprived of something they do not have. A feeling of being deprived can stir emotions of resentment and anger, another source of social divisiveness. (In discussing these problems it should be noted that BLM is not the only agency trying to increase easy access to the Rocky Mountain Front. The Forest Service is doing the same thing.) Pressure for more and easier access is a symptom of overpopulation and its resultant crowding. All Montanans are finding a less roomy state as population pressures mount and it gets harder to "get away from the crowds." Grizzlies are affected by the same problem.

3. Background on the Northern Continental Divide Ecosystem

The Northern Continental Divide Ecosystem supports -- so far -- the largest and most viable grizzly population in the lower 48 states. But the current and future size of this population, and its future listing as threatened, endangered, or recovered cannot be determined by population numbers alone; because you can't have more bears on less land, the status of habitat is a crucial factor. And what is the status of grizzly habitat in NCDE? In a word: declining.

Habitat is declining in NCDE, but not because of any great and overwhelming threat that affects many acres at once. Instead, NCDE grizzlies face dozens of existing, proposed, and potential losses from a broad range of sources all around NCDE. A list would include the following:

Oil-gas activity near Waterton National Park

Bear removal-mortality near Waterton

Coal mining in SE British Columbia

8d

Subdivision at Moose City

Other subdivision on the North Fork

Forest encroachment into shrubfields of Apgar range

Improved county road up the North Fork

Expanded phone service up the North Fork

Expanded Park Service and Forest Service employee/visitor centers at Polebridge

Expanded restaurant services on Big Mountain

Roads and timber sales on Big Creek, etc.

Checkerboard ownership of the Swan Valley

Open roads in the Swan Valley

Subdivision of the Swan Valley

CTearcutting in Monture area

Subdivision in upper Blackfoot

Other subdivision in Lincoln-Ovando area

Existing access to Rocky Mountain Front (RMF)

Forest Service proposals for RMF access

BLM proposals for RMF access

Oil-gas activity proposed for RMF

Unresolved wilderness disposition for RMF

Subdivision along the RMF

Mortality sinks along the RMF

Parking lot proposed at Summit

Trout habitat decline in Skyland area

Drought throughout the ecosystem

Knapweed throughout the ecosystem

Disposal of discarded human foods in the ecosystem

Other human-caused problems

14

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Obviously, while this list cannot be regarded as complete, it does illustrate that NCDE is not a secure habitat for grizzly bears, and that in general NCDE is declining as habitat for grizzlies because of piecemeal intrusions which -- by themselves -- are not a serious threat, but which -- added together -- indicate high potential for decline in the grizzly's population numbers as a consequence of continuous and expanding human use/occupation of the lands that grizzlies need.

The trouble is, all these problems are not evaluated in an ecosystem-wide cumulative effects analysis and mapping that would allow agencies to see how crowded and "busy" NCDE is becoming. Instead, new development is added to old in a piecemeal fashion, as if each was the first and only possible threat to the bears that live in NCDE. Land management agencies can thus operate under the illusion that their individual projects are not "significant."

4. Grizzlies and Access on the Rocky Mountain Front

The Rocky Mountain Front is one area in the lower 48 states where there is agreement that the grizzly bear population has grown--probably up to acceptable limits -- in recent years. The existing local conditions responsible for this growth are varied, but the existing level of access is one of them. Changes in the ease of access would undoubtedly have impact on the grizzly bear and other wildlife, as well as on local factors such as social cohesiveness and economic alternatives. Because of these varied types of impact, BLM must prepare an environmental impact statement on its access plans, and must integrate its access plans in a cumulative effects analysis that includes other issues such as oil-gas drilling vs. wilderness, subdivision vs. ranch preservation, access plans proposed by the Forest Service, access vs. outfitters, etc.

15

16

BLM's AP/EA states this about access on the Front:

> The BLM believes that since these lands are public lands, they should be accessible to all publics. (P. A-47, emphasis added.)

Further, the AP/EA says:

> The BLM must obtain easements for the type of physical access needed. (P.A-47, emphasis added.)

The AP/EA also declares that:

> Achievement of these objectives will occur through balanced use of exchanges, rights-of-way acquisition, grants, cooperative public/private management programs, or any other process that works. (P. A-47, emphasis added.)

16

NEPA does not require BLM to prepare an EIS on its access plans prior to the routes being defined. Once a route is determined to be feasible and necessary for multiple-use management of the BLM-administered land, an environmental document is prepared analyzing the effects of the action. This document would contain a biological assessment as well as a cumulative effects analysis for formal consultation with the USFWS. Easements would be pursued on a "willing seller" basis. A land exchange, memorandum of agreement, cooperative agreement, or as a last result, condemnation could also be used to obtain access. In all cases, impacts to the public as well as the environment would be displayed in the environmental document.

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Thus it appears that BLM is very strongly committed to providing easy access to the Front, possibly even by pursuing adversary proceedings such as condemnation. Since these steps by BLM can be very costly to landowners, an EIS should be prepared in order to publicly display these costs. That EIS should also display costs to BLM -- therefore to taxpayers. Our point is that you are creating local distress at public cost, and you must get those cards on the table, as required by NEPA. 17

Our concern here is that, as you force local landowners to respond, you may create pressures that force them just a little closer to the economic brink, which would be a threat to the grizzly bear because you jeopardize ranchland ownership in an era when the agricultural economy is in transition. This may force landowners to sell out, and -- because ranchers can't afford to buy a neighboring ranch when it comes up for sale -- you may be pushing nationally significant ranchlands into the clutches of "land developers." NEPA and ESA require that you look ahead, but the AP/EA do not do so. We urge you to generate alternatives that are supportive of the local ranching community, which plays such an important role in grizzly bear conservation, and not -- as at present -- alternatives that are antagonistic to preservation of nationally significant ranchlands.

The AP/EA states this about the BLM's Outstanding Natural Areas, to which it is striving to provide access:

> The four ONAs are relatively small in comparison to other adjacent public areas.... (P. A-49)

That's true, but your access plan has potential for a large zone of influence that extends well beyond the ONAs themselves and could affect the local outfitter business. 18

The AP/EA states that the four ONAs:

> ...are to be managed "essentially as wilderness." (P. 1)

The AP/EA further states that, in their present condition:

> The ONAs have a high overall wilderness quality. They are nearly pristine, with outstanding opportunities for both solitude and primitive recreation. (P. 9)

But easy access is a kiss of death for any area's ability to provide an "outstanding opportunity for solitude," which is one of the major factors of wilderness as described in the Wilderness Act. How can BLM manage the areas as wilderness when it would create easy access that undermines one of the most fundamental qualities of wilderness? 19

The map accompanying the document on State Director Guidance reveals that the four ONAs along the Front are under highest priority

17

Specific details for any given transaction will be developed and documented through an activity plan and accompanying route analysis. Such action will comply with the requirements of FLPMA and NEPA. The Environmental Assessment for the ONA Activity Plan has been revised to state that condemnation could have the potential for adverse impacts to private landowners.

Text Revision, Page EA-21, insert between the 3rd and 4th paragraphs: Condemnation could be used to obtain public access as a last effort, if negotiations fail to produce an acceptable access route. Condemnation could have the potential for adverse impacts to private landowners. Landowner concerns for vandalism, hazards and litter could increase, resulting in conflicts between public land users and private landowners. A ranch unit segregated by an access route could decrease in market value but compensation by the eminent domain process would take into account the change in property value before and after condemnation.

Please refer to response No. 16 for additional information.

18

You are correct that the activity plan has the potential for impacts beyond the ONAs. As noted on page EA-21 of the draft ONA Activity Plan, 3rd and 4th paragraphs, "...this (public access) could affect outfitters who use the area by curtailing some recreation use associated with guided trips." and "This business activity (recreation/wildlife related expenditures) would occur in Teton and the surrounding counties and is a small fraction of the total business activity in the area." One outfitter is permitted to use areas in the ONA boundaries at present. Public access could disrupt some business connected with those clients who would not want increased recreation use or others who would decide not to use a guide.

It is not the responsibility of BLM to ensure that local outfitters have exclusive rights and means to hunt a particular area. The BLM, as a public agency should try to ensure that the wildlife resource and BLM-administered lands can be properly used by all interested publics.

Because of access difficulties, the ONAs and large areas of National Forest west of them receive little hunting pressure from the "average" sportsman, and several areas (Deep Creek/Battle Creek and Chute Mountain) are essentially functioning as a private hunting area for a few outfitters and a few others so equipped. The BLM does not believe that by allowing others to access the eastern boundaries of the ONAs it would significantly affect outfitter business because much of this back country area would still be unavailable to a hunter on foot.

19

These ONA areas are not to be managed as wilderness because the July 1984 ROD implemented the non-suitable recommendation for designated wilderness. It was determined that these units did not meet BLM's wilderness criteria and therefore the option to manage the existing resources was to implement an ONA designation. The intent of access is to provide legal and physical opportunity to recreate on these public lands.

8g

for creating easy access, with that access to be provided in the next 0-5 years. But nothing in the State Director Guidance or AP/EA gives the basis for this priority, leaving significant uncertainty about the public value of this aggressive priority decision in areas known to be crucial to a variety of threatened and endangered species. You should do an EIS and display for public review the methods and rationales for determining which areas are chosen as "high priority" for creation of access.

20

The AP/EA states this:

> Oil and gas exploration and development has occurred in the past 35 or more years, and the future appears likely to hold more of the same. (P.2)

Well, if more of this activity is "likely," you are obligated under NEPA and ESA to consider it in a study of cumulative effects that are foreseeable, or likely. You must do an EIS that meets your legal obligations.

21

In describing BLM's management objectives for these areas, the AP/EA says BLM will do this:

> Comply with all management restrictions and participate in described goals and monitoring efforts.... (P.5)

But you are talking about work that will have a cost. For instance, monitoring will require staff, travel, vehicle use, and other costs. Where will BLM get the money, and what will happen if the money for monitoring isn't granted in your budget? Will you then close the access routes and rehabilitate the land they cross? You need an EIS to display the options.

22

The AP/EA states:

> The federal lands in the ONAs will be retained in public ownership. This allows for the investment of public funds for new recreation developments such as trailheads.... (P. 9, emphasis added.)

Sure, but it doesn't require those investments. There is certainly a difference between "allow" and "require," and we are concerned that agencies too often favor spending over savings, particularly when the spending produces divisive controversy.

The AP/EA says:

> No cross-country travel (by off-road vehicles is permissable. (P.9)

17

20

Access priorities were developed by individual BLM offices for retention zones, which are lands that are to remain in public ownership based on land use planning. Any future investments in public facilities and improvements, including land and access acquisition, generally would receive highest priority in retention zones (page 111 of Headwaters RMP/EIS). State Director Guidance, issued in April 1983, provided criteria for use in categorizing BLM-administered land for retention or disposal, and for identifying acquisition priorities (HRMP, page 13).

The draft State Director Guidance on Access issued in August 1988, summarizes and/or complements and supplements existing land use plans, such as the Headwaters RMP/EIS, with information obtained during BLM access inventory and needs assessments. Access management is based on land use or activity planning.

Access needs are determined on the basis of resource values, public demand, size of land unit and BLM investment. Recreation, wildlife, and scenic values are the resource values that were the basis for ONA designation of these areas. The draft State Director Guidance on Access states that legal access is to be provided to rivers, water bodies, trails and tracts of BLM-administered land having significant values for outdoor recreation. The guidance directs access development or control of access to manage wildlife habitat, hunting, fishing, or non-consumptive wildlife uses.

21

The HRMP (final, July 1984) addressed oil and gas exploration and development along the Rocky Mountain Front, including the four ONAs. This activity plan does not amend or change those decisions made in the HRMP.

NEPA does not require an EIS on speculative oil and gas development. NEPA does require a full field oil and gas development environmental document when a producing field is defined, as is the case with the Blackleaf EIS, which includes the Blind Horse ONA. An environmental document will be completed that analyzes the cumulative effects if and when the other ONAs are explored, and the BLM has jurisdiction. Such oil-gas development will require drilling from outside the ONA boundaries. BLM is committed to analyzing the cumulative effects of any and all activities proposed along the Rocky Mountain Front.

22

Decreasing budgets are a concern for all government agencies, including BLM. Each year money is budgeted to do the necessary work, however, budgets are at times insufficient. The Rocky Mountain Front and the ONAs are a high priority area of national interest, and some level of monitoring will be done. BLM has other ongoing activities along the RMF that require monitoring and this can all be done together, often "killing two birds with one stone." There is no guarantee that any program will be funded since appropriations are made by Congress on an annual basis. However, the BLM is committed to providing access to and recreation on the BLM-administered land and monitoring activity levels is part of that commitment. If funding is reduced in the particular area, there are alternative ways of funding the workload such as volunteers, challenge grants, private sector initiatives, and shared agency responsibility.

8h

23 Yes, but can you enforce it? Enforcement always entails cost, but we see little or no explicit attention to this cost of your plan. We do see, however, that you are committing public money to a plan that can jeopardize the ranching culture and endangered wildlife at a social as well as an economic cost to private landowners and the public treasury. The absence of these kinds of cost accounting is a major deficiency, and if BLM truly intends to go ahead as planned, it has a legal obligation to get these cards on the table.

The AP/EA correctly states that:

> BLM's most important contribution to the security and continued welfare of RMF wildlife is closely tied to the management of the ONAs. (P.21, emphasis added.)

Yes, but wildlife "security" is reduced when easy access allows more people into the midst of wildlife habitat. Where access is made easy, grizzly bear security is reduced by human pressure that can cause displacement for wary bears and habituation for incautious ones; can also increase bear mortality caused by poachers, and by the vandals who shoot virtually anything that moves; and can put similar stress on area livestock and ranching.

The AP/EA says:

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> Camping in ONAs would be allowed during any season of the year, but monitored to determine if levels of overnight use would be high enough to develop wildlife problems (e.g. spring grizzly bear habitats or ungulate winter range). If camping levels would
24 become detrimental, BLM would reassess policy and restrict camping by season until consequences are acceptable. (P.21, emphasis added.)

Significant uncertainty raises its head in that statement. We've already mentioned uncertainty the Congress will grant money for monitoring, but there is equal (and additional) uncertainty about the following:

> What levels are "high enough" to cause problems?
>
> How easy is it to restrict camping once the public has had access to an area for that purpose?
>
> What consequences are "acceptable"?
>
> How could BLM protect watersheds from giardia?
>
> Will knapweed invade ONAs and neighboring ranches as a result of roads and parking lot construction? What would a knapweed invasion mean in terms of costs incurred by neighboring landowners, and what biological

23

BLM will enforce the ORV regulations and closures along the RMF and ONAs the same way as done in other areas. The parking areas will be completely fenced and will display informational signs, including the ORV regulations. Other roads and trails entering the ONAs will be physically closed with berms or some other type of "natural barrier" and signed as closed.

Should people violate the road closures, BLM will coordinate with BLM special agents at the BLM Montana State Office and the local law enforcement agencies, such as the county sheriff.

24

BLM envisions little interest from the public for camping on spring bear range or on ungulate winter range after the hunting season. During other times of the year, camping activity would be less harmful to the grizzly as bear activity is not as concentrated on or near ONAs. Increased camping interest would be a direct result of increased access, and BLM is committed to closing roads at critical periods for grizzlies and ungulates if road use exceeds a very low level during critical periods. In the case of the Blind Horse route which was well enough defined to initiate Endangered Species Act consultation and analyze with the Cumulative Effects Model; BLM has stated that roads will be closed if use of the road occurs on a daily basis during winter or spring (see pages A-28 and A-33 of the draft ONA AP). Similar restrictions will be applied to any access route for these time periods, and road closures will essentially eliminate camping. Locking gates and officially closing the area to camping is not difficult to accomplish.

Giardia occurs in unaccessible areas as well as accessible areas.

Knapweed could be introduced along roadways. BLM is actively controlling noxious weed spread on all BLM-administered lands as well as neighboring lands through agreements with county government.

Increased fire risk would be negligible, and ability to control wildfire threatening adjacent private land would be increased.

BLM is attempting to facilitate a means where controlled wildlife harvest can occur in these areas and where competition with livestock could be lessened where it does exist (refer to response No. 3 for additional information).

Road use is expected to be at such low levels that vehicular exhaust and fugitive dust will not be a problem.

impact would it have on livestock/wildlife forage?

How much increased risk of human-caused range and forest fire would result from increased/easier access?

Why does BLM consider the condition of wildlife habitat in the context of livestock grazing without also considering how wildlife grazing on neighboring and nearby ranches affects the condition of "livestock habitat"?

How would vehicular exhaust and fugitive dust affect tooth wear and survival of livestock and wildlife grazing adjacent to the proposed road and parking lot?

25 These and other unresolved questions are matters of significant uncertainty and are, singly and together, a reason for conducting an EIS that includes a worst-case scenario where A) ranchlands important to wildlife are lost to land developers as a result of economic strain placed on current landowners; where B) a combination of knapweed, dust, and other factors decrease the value of habitat on the ONAs; where C) BLM budget cannot keep up with demands created by the access acquired; where D) the zone of influence on wildlife extends beyond the ONAs themselves to nearby migration staging areas and migration routes for deer, elk, bighorns, goats and to calving (elk) and lambing (bighorn sheep) grounds and other important habitat for the mobile wildlife of the RMF; and where F) Forest Service access plus oil-gas activity also exist.

A road is an irretrievable and irreversible commitment of resources, requiring an EIS. BLM plans roads and parking lots. But BLM has not done an EIS, and must do so.

We recommend that you consider the following:

Work with local ranchers to produce alternatives that preserve ranchlands as well as ONAs, rather than producing divisive "ranching versus access" controversy.

Consider how wildlife reaps benefits from ranchlands while, at the same time, ranchers also benefit from grazing on adjacent public lands.

Consider impact on wildlife of any BLM action that puts economic strain on the ranching community along the Front.

Generate more than the two alternatives (No Action vs. Preferred) in the AP/EA.

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25

The environmental document prepared for an access route will analyze the cumulative effects of that action. At this time it is premature to do an environmental analysis on speculative and still undefined access routes.

Please refer to response No. 16 for additional information.

8j

Evaluate ONA vs. wilderness for their relative ability to curb knapweed; giardia; vandalism such as fence damage; poaching; rustling; and dispersal of people into the mountains.

Keep up the much-needed monitoring of climate data and commence studies to determine climatic influence on soils and vegetation.

Ask the RMF Ranger District in Choteau to provide copies of correspondence from GBF about grazing permits on the Front.

See if you can't hire someone or find an existing employee who can do on-the-ground studies of habitat conditions on grazing allotments, without needing to drive to the sites. (Do not use such studies as an excuse for the proposed access.) The agency doesn't have to mechanize such studies when they can be done by people who are willing to walk.

Commend ranchers whose grazing allotments are in "excellent" or "good" condition.

Consult with other agencies to see which one(s) will have firm funding for needed monitoring and enforcement if BLM pursues its access plan along the Front. If none will have firm funding, put the plan on the shelf.

Prepare an EIS with a worst-case scenario if BLM does do ahead as planned, and initiate formal consultation with the US Fish and Wildlife Service, under Section 7 of ESA.

Work with other agencies to develop an ecosystem-wide cumulative effects analysis -- or at least a good map -- that allows managers to see how much housing, roads, other access, and other developments already exist in NCDE grizzly habitat.

Review District and Appeals Court decisions on cumulative effects and related issues.

Thank you for this opportunity to comment on BLM plans to provide easy access to the Rocky Mountain Front. We look forward to your reply to the numerous, varied, and cumulative issues we have described.

Sincerely,

Lance Olsen
President

cc: GBF Directors
National Wildlife Federation
Sierra Club Legal Defense Fund
Defenders of Wildlife

cc: John Cobb
Wayne Brewster-USFWS
Chris Servheeen-USFWS
John Weaver-USFS,R-1

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8a

MEMORANDUM

TO: Bureau of Land Management
Lewistown District Office
80 Airport Road
Lewistown, Montana 59457

FROM: Saypo Cattle Co.
Choteau, Montana 59422

DATE: August 30, 1988

RE: Comments on Rocky Mountain Front Outstanding Natural Areas (ONA) Activity Plan/Environmental Assessment (July 1988)

Saypo Cattle Co., a Montana corporation, owns and leases in excess of 32,000 acres of rangeland adjacent to the east boundary of the East Front Allotment of the Chute Mountain and Deep Creek/Battle Creek Outstanding Natural Areas.

It presently holds approximately 5,700 acres of BLM leases within the ONAs. The corporation is the alter ego for five generations of the Salmond family that first settled in the area and commenced grazing cattle on parts of the ranchlands in the 1880s and thereafter successively expanded the acreage to its present size by homesteading and acquisition. The Salmond family and Saypo have held leases on the East Front ONA lands for more than 50 years.

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The Salmond family, in cooperation with federal and state lease management and wildlife representatives, has managed both public and private lands in the ranch area for the protection of wildlife, maintenance and enhancement of forage and reasonable regulation of hunting and recreational use under leases, cooperative agreements and its independent initiative. It comments on the proposed Activity Plan and Environmental Assessment as one of the principal private interests directly affected by management changes proposed therein, by the historic pattern of federal resource management under subpart 4100 of the Department of Interior regulations and under a comprehensive integrated deeded land and leasehold management plan that has been put in place by the State of Montana. Through these programs, the ranch has maintained appropriate field rotation, has limited AUMs to cyclical grazing capacity frequently below numbers authorized by lease or directive, has raised buffalo, maintained forage for elk, deer, big horn sheep and antelope on the property, and has made accommodation for spring and summer grizzly bear habitat on both fee and leased ranch lands. It has also conducted an annual program of spraying noxious weeds on both leasehold and deeded lands to optimize protection of Idaho fescue and rough fescue grasses and destruction of invaders

9b

through more than a century of responsible management of ONA and contiguous east range areas.

Saypo and the Salmond family members have far broader exposure to the range regimen and cyclical problems of the affected area than that evidenced from two short single transect observations of the Bureau of Land Management officials in 1981 and 1987. Set out below are comments directed first to the substance of the Activity Plan, next to the shortcomings in the Environmental Assessment and finally to the correction or supplementation of erroneous assumptions and statements of fact in the documents reviewed.

I. The Activity Plan.

On the basis of the broad background and century-long experience of the Salmond family through its range management programs in the area, Saypo continues to support the Headwaters Resource Area's Resource Management Plan, the designation of the Blind Horse, Ear Mountain, Chute Mountain and Deep Creek/Battle Creek ONAs and the management objective for said areas to "protect the wildlife habitat, scenery and other resources from disturbance" and to "insure that they are managed essentially as wilderness." It believes, however, that those objectives can best be achieved under the No Action Plan, with modest modifications, for all the reasons set out below. It further believes, from the totality of the comments BLM received at its public meetings on February 23 and 24, 1988, that substantially all public and private interests in the Lewistown District support the same position for most, if not all, of the stated reasons. Nothing, however, in any statute or applicable BLM regulation requires that land so designated be excluded from reasonable and responsible grazing, oil and gas and minimal development or any multiple-use employment contemplated by the Multiple Use Land Act and the Federal Land Planning and Management Act.

26

1. The ONAs are unique for their scenic, wildlife and wilderness characteristics and should be preserved in the manner projected by the Resource Management Plan. All of the ONA lands can be protected and managed in ways that meet the objectives of such plan under existing regulations of the Department of Interior (43 CFR subpart 4100). Such approach makes incentives and limitations rest on actual experience and makes them responsive to results; it avoids the imposition of conditions and procedures on the basis of cursory examination or speculation alone.

2. The entire Salmond Ranch is presently monitored by a State of Montana program with essentially the same objectives as the proposed Activity Plan and with the cooperation and support of all affected interests.

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BLM does not intend to exclude grazing, oil and gas exploration or any other multiple-use activity in the ONAs as long as those activities are consistent with the Headwaters RMP and this AP. Multiple-use activities will be permissible as long as they do not adversely affect the values for which the area was designated.

9c

3. Regulation under the existing structure avoids an inevitable water rights confrontation. Saypo has filed on and holds water rights predating the establishment of the ONAs for substantially all of the waters generated on the East Front Allotment and flowing across the deeded and leased lands on the east. Furthermore, the Salmond family initiated and dominated the 19th century water hole grazing in parts of the ONA areas on which the BLM bases its nonreservation claims. Saypo and others can make existing rights available for wildlife enhancement within the ONA boundaries, but it must certainly attack independent federal claims of new water sources for that purpose.

27

4. It is ridiculous to assume that any decline in the mule deer population in the area can be reversed by increasing public access for hunting, fishing, camping and other purposes; tighter hunting permit procedures can, and in fact already have, provided protection comparable to that sought by the Preferred Action Plan.

28

5. BLM regulations provide that changes in management resulting from reclassification of lands shall give appropriate consideration to present and potential uses and users of the lands affected and, all other things being equal, achieve maximum future uses and minimum disturbance to or dislocation of existing users. (43 CFR § 2410.1(b).) That regulatory objective can be achieved under the No Action Plan through cooperative action between the lessee, the State and the BLM in improving forage for both wildlife and grazing use, for protecting wildlife on both public and private lands and achieving a balance between public use and benefit objectives and protection to a severely distressed agricultural economy.

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23

6. In addressing the regulatory objective, recognition must be given to the fact that the ONAs are small in size and adjacent to extensive Lewis and Clark National Forest lands on the west, the ONAs being narrow slivers of land that range from a mere 1/2 mile to 1-1/2 miles in width to the extent they adjoin the Salmond Ranch. They cannot alone significantly impact protection and enhancement of threatened or endangered species, and are not, standing alone, needed for the development of recreational opportunities on the public land, forest land and wilderness area reaches of western Montana. In fact, according to plan analyses, most of the grizzly bear denning and grazing habitat is in the forest lands on the west; no present habitat has been identified for the bald eagle and peregrine falcon, and grey wolves are wholly incompatible with the livestock industry and need not be regenerated on small tracts in a ranching area. Under present regulations, wildlife and livestock can be developed compatibly for the benefit of both; under the Preferred Action Plan, the development of new small tract habitats for the grey wolf and allocation of all forage increases from conservation programs to wildlife will impact severely on ranching on both public and private lands.

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No water rights claims or permits presently exist on any of the ONAs. BLM will claim any existing water sources on new developments in accordance with state water law.

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When wildlife habitat conditions are not at optimum conditions, it is logical to assume that excessive livestock influence along with overpopulated deer use of the area may have led to this situation. If habitat conditions are to improve, a combination of sound grazing management principals along with proper deer harvest will be necessary (refer to response No. 3 for additional information).

29

The classification of these lands as ONAs did not change the livestock use (i.e., to nonuse). It should be noted the present livestock agreement with the Department of State Lands and the Saypo Cattle Company has never been reviewed or signed for agreement by the BLM as a cooperator and yet the plan presumably includes management practices on BLM-administered land. BLM was never given the opportunity to review this plan and did not realize the plan was implemented on the BLM-administered lands (the Great Falls Resource Area Range Conservationist attended a round-table discussion with the Saypo Cattle Company and the Montana Department of State Lands on October 19, 1988. The BLM agrees to the livestock grazing plan currently in effect with modifications, to be reviewed by Saypo Cattle Company and the Montana Department of State Lands). The Rocky Mountain Front ONA/EA infers that BLM intends to manage livestock in a cooperative way with due consideration for the needs of the livestock operator but also in consideration of "the ecology, priorities of use, and the relative values of various uses" (CFR 2400.1). The resource objectives could be achieved, as stated in the comment, under a No Action Alternative only if cooperative action between the lessee, the state and the BLM occurs and by monitoring and reviewing the supposedly existing rest-rotation grazing plan. Presently this scenario does not exist and thus there is no basis for saying that the No Action Alternative will meet the resource objectives of the BLM. Observation and monitoring of a rest-rotation pasture on BLM-administered land within the existing Department of State Lands (DSL) rest-rotation plan has not occurred by DSL according to a phone call to Charles White, DSL, Conrad, MT.

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BLM recognizes the importance of considering habitat improvements on an entire ecological unit regardless of land ownership (pg. EA-18, first paragraph). That is the reason BLM has proposed the grazing system.

If gray wolf prey species habitats did improve in this entire unit, the possibility of gray wolf occupation would increase. If control of depredating wolves was necessary, such control would be undertaken under the direction of the U.S. Fish and Wildlife Service Recovery Plan/Wolf Control Plan.

9d

7. Access under the No Action Plan can be enhanced by on-going forest service trail development on the west and by road accesses entering on the north and south with connected trail bike and horse trails along or through the several areas. The alternative proposal of condemning up to eight access routes through the ranch lands on the east will provide little enhancement in beneficial use, but will severely impair the
31 ranching value and useability of lands crossed. Such action wholly ignores any balance between public benefits and private burdens and, for unheralded economic reasons, may lead to the subdivision and sale of grazing properties for cabin and recreational use. If such a move is forced on to the ranching economy, it will wholly destroy the objectives of the Resource Management Plan and the ONA designations.

In general, the activities proposed under the No Action Alternative are directed to the attainment of the Resource Management Plan objectives, i.e., the protection of wildlife habitat, scenery and other surface resources from disturbance. The activities outlined in the Preferred Action Alternative, on the other hand, are directed primarily at the development of access, promotion of recreation, increase in hunting opportunities and potential restriction on grazing programs.
32 Each of those impacts necessarily affects adversely the development of wildlife habitat and the enhancement of wilderness values; and each is contrary to the stated objectives of the Resource Management Plan.

32A

II. Environmental Assessment.

The Environmental Assessment appended to the Activity Plan is an ambiguous document. It nowhere addresses the question whether the Activity Plan constitutes a major federal action having a significant impact on the human environment; it is not an Environmental Assessment in an EPA regulation sense, as it seems to assume an Environmental Impact Statement is not
32A necessary for decision-making on the Activity Plan issue. Although it invites public comment on an EIS pattern, it is almost wholly silent on the environmental impacts of the various proposed actions under the Preferred Action Alternative. And where it addresses impacts, it seems to provide only opinion and speculation justification, not facts available from a reasonable investigation process. In particular, the document is most vulnerable as an Environmental Impact Statement in all of the following respects:

33 1. It does not address in any way the significant impacts, cumulative effects or effects on adjacent lands that may result from the proposed access acquisitions. A failure to provide an adequate analysis of such issues would appear to be a clear violation of NEPA. Nowhere does the Environmental Analysis address the effects of the proposed actions on adjacent lands. When the future condition of adjacent lands is unknown,

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The Preferred Alternative does not propose condemning the access routes to the ONAs, however it does say that condemnation will be used when landowner negotiations fail to produce an acceptable route. BLM policy is to make a good faith effort to negotiate access on a willing seller basis.

BLM does not feel that public access to the ONAs will impair the ranching values or use of the lands crossed by a public access route. If severe damages are identified, they would be considered during the easement negotiations. With the availability of maps, and a good signing program, public access to the public land may actually help the local landowner by directing the public away from the private land, thereby lessening trespass.

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Please refer to response No. 3.

32A

The environmental assessment does not address the question of a major federal action having a significant impact on the human environment. This question will be addressed when the Record of Decision is issued with the final ONA Activity Plan.

33

At this time, specific access points to the ONAs are still undefined, with the exception of the Blind Horse ONA. An environmental document will be done analyzing the cumulative effects of that action when other routes are specifically sited.

NEPA requires analyzing the worst-case scenario. In the case of the Salmond Ranch, the worst-case scenario could easily become a cold hard reality; where once the deer and bear were sheltered from public pressure on the ranch, they may find their habitat destroyed by the subdivision of the ranch and sale of cabin sites to multiple owners.

2. The Environmental Assessment comments on range-livestock, wildlife and fish, cultural and historic water quantity and quality and related subcategories in the environmental consequences section do little more than restate the Activity Plan. They state opinions of undocumented sources without notes relating to any investigation or, for that matter, any documentation of fact. As a whole, the Environmental Assessment is no more than a self-serving statement that what the BLM proposes to do is a good thing and, in the opinion of the programmers, will not hurt anybody. Further study is needed to support the character of changes proposed in the Preferred Action Alternative. Such studies and objective evaluations will show the negative impacts of the Preferred Action Alternative on the goals of the Resource Management Plan. Such studies, and the decision-making information derived therefrom, can be obtained from continued administration under the present regulations, i.e., implementation of the No Action Plan.

34

III. Corrections and Supplemental Data.

In the following particulars, the Activity Plan and accompanying Environmental Assessment contained misleading and inaccurate assumptions and statements. Correction is needed for the decision maker to exercise responsible judgment with respect to the Activity Plan alternatives.

1. There is considerable misinformation and conjecture throughout the Activity Plan/Environmental Assessment document with respect to impacts of cattle grazing on the ONA lands. Under existing regulations, the Salmond Ranch, for instance, has implemented a grazing plan that meets all the wildlife habitat and species objectives in the Deep Creek/Battle Creek ONA. In particular, in 1984 the Salmond Ranch worked with the Montana Department of State Lands in formulating a three-year rest rotation system. Five options were considered, with one being adopted. Although this plan called for five months of grazing, the usual season has been limited to 3-1/2 months, i.e., June 15 to October 1. The plan employed was chosen for the following reasons:

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a. It allowed flexibility in rotating pastures due to drouth.

b. Overall ranch pastures were integrated, thereby making it more convenient to disperse livestock.

34

The activity plan is specific guidance and management direction derived from general direction and policy outlined in, and in conformance with, the HRMP (final July 1984). The activity plan does not change or amend the HRMP.

The environmental assessment analyzes the impacts of the alternatives discussed in the activity plan. This environmental document was prepared by an interdisciplinary team of resource staff so that consideration of various resource values and impacts could be thoroughly addressed. The Preferred Activity Plan best meets the BLM goal of perpetuating the values in the ONAs, while allowing non-conflicting multiple-use activities to continue.

35

A Department of State Lands grazing plan with Saypo Cattle Company was written in 1984 by Pete Strazdas. BLM was not informed of this plan or given a opportunity to review or concur with it, prior to the activity plan being prepared.

9f

c. It allowed greater utilization of some pastures by (i) permitting the cutting of all available hay, and (ii) allow renewed growth of the aftermath for forage purposes.

d. It required no cross fencing, an unnecessary leasehold expenditure.

The criteria used for implementing the plan were based on the AUM-per-acre guidelines. The data were provided by the Montana Department of State Lands and the Salmond Ranch management concurs with it. The use of the data permitted an accurate comparison to be made between pastures and, more importantly, the carrying capacities for each. Such programs and results were wholly ignored in the Activity Plan analysis.

2. The cost estimates in Table 12 are extremely low. A cross fence along Chute Mountain and fences in the Deep Creek/Battle Creek ONA will cost significantly more than $15,000. The ruggedness of the terrain and the inaccessibility would dictate the use of a helicopter. Figure 9, page A-12 gives no information as to where the fences will be located on the Deep Creek/Battle Creek ONA. Maintenance costs for fences in the general area will also be substantial.

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3. The discussion of range land monitoring on pages 33 and 34 are puzzling and misleading. The transect areas were never marked. The transect observations were recorded on only two occasions when negative forage information appeared while inspectors made observations each year, at least on the Salmond Ranch leases, and presumably calculated measurements every year. The one transect on the south fork of Deep Creek is the point where livestock water and is hardly representative of conditions throughout the leased area. More objectivity would certainly be achieved if several sites on a lease were monitored and evaluated.

37

4. It is assumed in the documents that the No Action Alternative will cause range deterioration or a continuation of poor range conditions because such was apparently observed at one transect observation in 1981 and another in 1987. The analysis wholly disregards the forces of nature and variations in rainfall and snowpack and the impact of floods on the on-going range environment. The drouth of 1988 has greatly impacted all of the ONAs. Floods in 1964 and 1975 virtually wiped out the riparian areas on Deep Creek. The fact is that growth conditions change from year to year and management practices must adjust to changes in conditions. The Salmond Ranch has managed these lands for over a hundred years. For instance, it has a spraying program in place that gives priority to weed control on an annual basis. (The principal invader it has to work with is leafy spurge, not the spotted knapweed described in the Activity Plan. The introduction of spotted knapweed in the Salmond Ranch area has

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An average price per mile for a steel post, four-strand, barbwire fence (materials only) was used to calculate the $2500 per mile cost. Since the labor cost was not included (BLM seeks a Cooperative Maintenance Agreement that requires the operator to build the fence, 50% of the total cost) the estimated costs shown reflect only BLM costs. Maintenance costs are the responsibility of the operator and thus are not included in the cost estimate, but are used in determining the cost/benefit analysis of the fence and to help prioritize the resource area range project budget. The two miles of private fencing proposed is not shown in Figure 9, pg. A12 of the draft ONA. Only BLM-administered land ONA fencing would be depicted in this figure, and since there was none proposed in this portion of the ONA none was shown.

37 and 38

Daubenmire condition and trend transects (1801 and 2001)

were established by the BLM Butte District in 1981, and were marked on the ground at that time (pictures taken). Upon revisiting these transects in 1987 and 1988, revealed the steel post reference marker and the steel rebar to mark the 100 foot transect had been removed. These transects have been remarked, read and pictures retaken. The data taken was not meant to be misleading and transects were not read when negative forage information appeared. Also, the transects have not been visited every year by the BLM since 1981, but only revisited in 1987 and 1988. Transects were established during the first week of August 1981, and were read at that time only in 1987 and 1988.

The location of the South Fork of Deep Creek is on the bench above the creek, a key forage area and represents similar sites all along the first bench above the creek on both sides of the creek. The second transect is at a higher elevation, away from water, and represents upland grazing in the cinquefoil-red fescue area. More monitoring sites are needed but because of constraints on monitoring time available and manpower the BLM has but the two transects which have been monitored.

The Great Falls Resource Area is monitoring temperature, precipitation and began mailing Actual Livestock Use forms in 1987. There was no response from Seypo Cattle Company. This environmental data (Blackleaf Recording Station) and actual-use data will be used to evaluate present and future grazing systems. The fact remains, however, that one key transect along the South Fork of Deep Creek has read poor ecological site condition in 1981, 1987, and 1988.

There is great potential to improve the poor and fair range condition to good and excellent condition as has been proven in the Blind Horse ONA (Chicken Coulee allotment implemented in 1974) which has the same Teton silty loam soils, elevation, and precipitation patterns. After 14 years, the Chicken Coulee allotment has improved from mostly fair condition to mostly good and excellent condition. The difference between the East Front allotment condition and the Chicken Coulee allotment condition is that fencing and water development, and more importantly, lessee cooperation with the BLM and other land managing agencies, has allowed a four-pasture (one is 100% privately owned) rest-rotation system to work.

been experienced along roads, such as the access routes proposed by BLM's Preferred Alternative in the Activity Plan.) Over a four or five-year cyclical pattern, observations and records can substantiate that the quality of the range has not materially changed over the past 100 years and will not deteriorate if the No Action alternative is pursued.

39 5. BLM wholly ignores in its Activity Plan and Environmental Assessment the significant impact public access will have on private land. If the private land is segregated by access routes, and the marginal economic base for cattle grazing is destroyed, the lands will be reassigned to their highest and best economic use, i.e., the subdivision and sale of cabin and recreation sites and the segregated leasing of grazing acreage.

40 6. The Activity Plan/Environmental Assessment focuses on access for recreation, assumes without analysis that impact from recreation will be minor, assumes that multiple access routes will be required for each ONA, and gives little consideration to the existing access routes from the west. In fact, only on page EA-1 is the access from the west through the Lewis and Clark National Forest even mentioned. There it describes the route as "long and difficult" but never describes the integrated trail system that is now in place on the Forest lands. From the south, one can travel Black Tail Gulch which emanates at Sun River. From the north, several routes start at the south fork of the Teton River. Some of these routes are fitted for trail bikes. The trail system is currently undergoing rehabilitation and expansion by the Forest Service and, in fact, provides the principal access to all of the ONAs at the present time. Every summer and fall the ONAs are populated by persons using the forest access routes. Whether these routes are long and arduous is pure speculation. At the very least, they accommodated 610 visits to the ONAs last year (EA-9).

7. Blatant inadequacies in the factual foundations and investigation that permeate the entire Activity Plan and Environmental Assessment are evident from misstatements of fact and opinion-oriented conclusions such as the following:

41 Page 9: "Livestock grazing management has been less than effective on federal lands in two of the four ONAs." This conclusion is not based on Salmond Ranch experience and is traceable, if present, only to a failure to implement existing regulations.

Page 20: "Continued threat of rapid spread of noxious plants in ONAs." Cf. EA-12 statement: "Very limited knowledge exists regarding noxious plant infestation of the ONAs." This apparent inconsistency aside, it is emphasized that noxious weeds (leafy spurge) present on the Salmond Ranch are being sprayed and monitored annually. Surface inspection would show no significant invasion by spotted knapweed or other noxious plants within the ONA boundaries.

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The potential for the subdivision and sale of cabin and recreation sites and the segregated leasing of grazing acreage can occur with or without public access to the ONA boundaries. The impact on private land could occur from vandalism, hazards and litter.

Refer to response No. 31 for additional information.

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Access is a key issue in this activity plan and rightly so. The broad spectrum of what type of access and how much is needed can be argued strongly by both sides. The intent of this plan is to keep these options open. Trailhead development provides the opportunity to concentrate or focus the visitor to a central area and provide interpretative services of some type whether it be ORV related, the enhancement of scenic values, etc.

The access across USFS from the west has been considered and is an important phase of this plan. Access from the east side is of equal importance and provides an opportunity for vehicular transportation to terminal points such as trailheads. As pointed out in comment No. 3, wildlife harvest is an important management tool for these ONAs and can be controlled by the amount and type of access.

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Until the Department of State Lands livestock allotment plan can be reviewed by BLM to determine if its objectives meet BLM requirements, there is no adequate way to judge the present grazing management in the Deep Creek/ Battle Creek ONA. A review with DSL, BLM, and Saypo Cattle Company is scheduled for the Fall of 1988. BLM grazing management on the East Front allotment, in past years, has been custodial. No intensive grazing management or range project investments have occurred. Since the East Front allotment is an "I" category (Improve) allotment, as determined in the Headwaters Resource Management Plan, it should be managed in the future under a more intensive grazing system that allows a portion of the BLM-administered lands rest and could improve vegetation or ecological site condition.

9h

Page 33: The East Front Allotment transect "read 'fair' for range class [in 1981] and has not been reread. Lupine (23%) and shrubby cinquefoil (11%) have invaded this range site." Although lupine and cinquefoil may be found within the area, a surface examination would show no encroachment comparable to the percentages stated.

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Page A-17: The "no surface occupancy" and "no lease area" on the plat are reversed.

Page EA-5: "Areas [are] currently in fair or poor range conditions due to continuous heavy livestock grazing pressure" and will "continue to experience accelerated erosion, degraded riparian sites and loss of vegetative cover." Again, this conclusion is not supported by any study and is contrary to current range experience.

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Page EA-10 and page EP-2: "The only historic site or feature known for the ONAs is the water diversion structure or flume in the vicinity of Chute Mountain." Surface examination shows no such structure or flume.

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Page EA-14: "Current [range] conditions shown on Figure EA-1 for long-term changes in vegetation condition would not be maintained . . . . The majority of range vegetation would go to fair condition within 10 years. More poor condition areas, especially riparian and key range sites, would be evident. Lack of noxious plant control would eventually lead to large infestations of spotted knapweed and locoweed and proportionately reduce quality forage." There is no basis for these conclusions or the Figure EA-1 projection on page EA-15, neither of which is supported by any discernable factual source.

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Page EA-1: "In the short term, it is estimated that recreation/wildlife-related expenditures in the area would increase by $182,000 annually." The statement and projections that follow are pure speculation.

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In lieu of groundless and inaccurate speculations as a basis for improving range conditions and protecting wildlife, continued operation under current regulations, supplemented with

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The percentages of lupine (23%) and shrubby cinquefoil (11%) were recorded in 1981 on transect 1801, Section 18, NW¼, T. 23 N., R. 8 W. This site is representative of the upper foothills bench below the reef and is very desirable to livestock as a grazing area. In 1988, the exact rebar location of the transect could not be found but was replaced in nearly the identical location by using the 1981 photographs as references. Shrubby cinquefoil, as a percentage of cover on a Daubenmire transect (20 cover frames read) showed 13.5% of the plant composition. Lupine was not recorded in 1988 on transect 1801 mostly because its leaves had already desiccated and the plant had withered away, lupine being more forb like than shrubby cinquefoil. Future readings of this transect need to be taken but so far the 1981 and 1988 reading are consistant (two different monitoring people) as far as cinquefoil percentages are concerned (11% and 13.5%)

Refer to responses No. 38 and 39 for additional information.

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The conclusions were derived from transect data, allotment inspection and from professional experience of the BLM monitoring staff.

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According to the BLM Wilderness Study inventory, these log chutes or flumes are linear vegetation clearings on the east slope of Chute Mountain, and are visible from the air but barely discernible on the ground (pg. 37, Montana Overthrust Belt Wilderness Inventory - Final Decision, Butte District 1980).

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Refer to respone No. 43 for additional information.

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The statement and projections are based on the data available for the ONAs and professional judgment of resource specialists. The following procedures were used to estimate the economic benefits. Economic benefits from mule deer hunting and non-consumptive recreation use have been quantified. Economic benefits fall into two general categories. The first is the market or nonmarket value of a good or service (i.e., price paid for stumpage, willingness to pay for recreation, etc.). The other category is the benefit from increased business activity, employment and income from direct expenditures (i.e., recreation expenditures for travel, food and lodging, etc.). The market and nonmarket values were used for the benefit/cost analysis found on page EA-21 of the draft EA. The expenditure information was used to estimate business activity, employment and income using coefficients from the BLM Montana Economic/Demographic Model (E/D Model). See the technical description for a detailed explanation of the E/D Model (Chase, Robert A., et al. 1982. Expansion and Adaptation of the North Dakota Economic-Demographic Assessment Model (NEDAM) for Montana. Ag. Econ. Misc. Report No. 61, NDSU, Fargo, North Dakota).

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on-the-ground studies are needed and may even be mandatory to satisfy environmental analyses requirements of NEPA.

Respectfully submitted,

SAYPO CATTLE CO.

By John C. Leland Jr.
President

Transmitted and filed on behalf of Saypo Cattle Co.

By: DAVIS, GRAHAM & STUBBS

By _____

Attorneys for Saypo Cattle Co.

Table TEA 5 shows the data and assumptions that were used to estimate recreation use and expenditures for the short-term. For the long term it was assumed recreation use would increase by 30 percent.

TABLE TEA 5 -- Short Term Increase in Recreation Use and Expenditures

ONA	Elk Days[1]	Potential Harvest[2]	Harvest Within ONA[3]	Potential Hunter Days[4]	Existing Hunter Days[5]	Increase in Hunter Days[6]	Other Recreation Use Days[7]	Recreation Expenditures[8]
Chute Mountain and Deep Creek / Basin Creek	1,300	325	195	1,950	95	1,855	810	$160,000
Ear Mountain	500	125	31	310	310	0	0	0
Blind Horse	500	125	28	280	50	230	100	$20,000
Total	2,300	575	345	2,540	425	2,115	910	$180,000

[1] Source: See Appendix 4: Wildlife Resources of the ONAs, page A-23 of the draft Rocky Mountain Front Outstanding Natural Areas, Activity Plan/Environmental Assessment.

[2] Assumes a 25 percent harvest ratio. Source: Personal conversation with Montana Department of Fish, Wildlife and Parks, 1988.

[3] Assumes 60 percent of the hunting would occur on BLM ONAs and Basin Wildlife Management Areas and based on the proportion of the ONA acreage to the total for BLM and State.

[4] Assumes 10 hunter days per animal harvested. Source: 1988 deer hunting data for hunting districts 441 and 442, Montana Department of Fish, Wildlife and Parks, 1987.

[5] Source: BLM Recreation Management Information System Data, 1988.

[6] Short-term increase is the difference between the potential and existing. This assumes recreation use would not increase under the No Action Alternative.

[7] Assumes a non-consumptive use/hunter day ratio of 0.43. Source: BLM Recreation Management Information System Data, 1988.

[8] Assumes $77.00 per hunter-day and $21.00 per non-consumptive use day. Source: The Net Economic Value of Deer Hunting in Montana, Montana Department of Fish, Wildlife and Parks, 1988 and Economic Techniques for Estimating Resource values and Analyzing Impacts During BLM Wilderness Studies, 1988.

10

HAUGE BROS.

DONALD T. HAUGE
278-7849

P. O. BOX 1472
CONRAD, MONTANA

MARVIN H. HAUGE
278-3526

Sept. 6, 1988

Bureau of Land Management
Lewistown District office

Gentlemen:

We think Your Activity Plan, for the Rocky Mountain Front, is Wonderful. I wish this could have been done 20 years ago.

We are especially interested in having Public Access roads to this area. If necessary for protection of Wildlife, We think these roads could be closed during the winter months, after the hunting season closes.

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Yours Truly,
Marvin H. Hauge

Marvin H. Hauge

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Please refer to response No. 24 and page A-28 of the draft activity plan for the response to this comment.

Note: The following new text is a response to comments raised at a public meeting regarding American Indian religious values of Ear Mountain in the Activity Plan, page A-51.

"Ear Mountain itself is a sacred area to the Blackfeet Indians" (Glacier-Two Medicine Alliance).

Response: BLM received no comments from the Blackfeet Tribe concerning the sacredness of Ear Mountain, or any other part of the ONA. However, the possible use of the ONAs in the traditional American Indian religious practices was considered in the Environmental Analysis. Since the Headwaters RMP specifies that the ONAs are to be managed "essentially as wilderness," no impacts to sacred sites are expected from the prescriptions in the plan.

UNITED STATES GOVERNMENT

memorandum

DATE: SEP 0 1 1988

REPLY TO ATTN OF: Division of Programs, Land and Minerals, Code 360

SUBJECT: Rocky Mountain Front Outstanding Natural Area Activity Plan/Environmental Assessment

TO: Environmental Coordinator, Bureau of Land Management, Lewistown District Office, Lewistown, Montana

FROM: Billings Area Director

Action

This office has taken the opportunity to review the Activity Plan for the Rocky Mountain Front Range Outstanding Natural Areas and the corresponding Environmental Assessment.

The proposed management plan will not adversely affect land uses within the Blackfoot Reservation. Therefore, we have no substantive comments.

Questions may be directed to Mr. Richard J. Stefanic at 406/657-6145.

Harry M. Sch

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

OPTIONAL FORM NO. 10
(REV. 7-76)
GSA FPMR (41 CFR) 101-11.6
5010-114

Bureau of Land Management
Lewistown, Montana 59457

To Whom It May Concern:

Re- Great Falls Tribune, Thursday August 25, 1988 page 14 A-BLM 's
Plan for public access is both reasonable and right.

Although I am not in the immediate area, I as many others have
an interest and right to cross or access as there was many years
ago. There are many established roads and pack trails
which are now closed some even locked. You may even be
challenged on the county roads in the area , I have been told
as well as walk as acts if vandalism. I have also heard fee
hunting is now available, a possible solution to this could be
recalling leases to existing parties, if any, and leasing to
cooperators.

A Concern Citizen
Yours Truly,

East Slope Back Country Horsemen
P. O. Box 1472, Conrad, Montana 59425
Sept. 7, 1988

Bureau of Land Management
Lewistown District office
Lewistown, Montana

Gentlemen:

Our Club willnot have a meeting until Sept. 20. 1988. I talk with several of ourmembers and Officers, They think Your Activity Plan for the Rocky Mountain Front, west of Choteau, Mt. is allright.

We as horsemen are interested in Public Access roads, into this Area. So trail heads could be establish, for riding into the back country on both the B.L.M. and Forrest Service land.

Most of our members think these roads, could be closed during the winter months. from December to April, If necessary for protection of Wildlife.

Yours Sincerely,
Donald T. Hauge
Donald T. Hauge

Treasure and Director of
East Slope Back Country Horsemen

Our purpose is to perpetuate enjoyable common sense use of horses in the back country; assist government agencies in maintenance and management of the resource, and educate, encourage and solicit active public participation in wise and sustaining use horses, commensurate with our heritage and the back country resource.

To: BLM Office Lewistown, Mt.

Sir:

I read the news release in the August 25th Great Falls Tribune. Myself and a large percentage of our Club Members feel that we should protect our present access roads and develop more where ever possible.

I personally have been envolved in the Dupuyer Creek Access road with the Boone & Crockett Club. At this point we are asking for donations to allow Public Lands Access Assoc. to initiate legal action to get control of this road for Teton County.

If I can be of any help in any way please feel free to call.

Walter J. Sill
Box 574
Valier, Mt. 59486
Telephone 279-3558

Member of Lake Francis Wildlife Assoc. Valier, Mt.
Member of Public Lands Access Assoc. Inc. Bozeman, Mt.

Billings, MT
Sept. 7, 1988

Great Falls Resource Area
Bureau of Land Management
215 1st Ave., N.
P. O. Box 2865
Great Falls, MT 59403-2865

SEP 8 1988

Dear Sir:

We offer the following comments on your July 1988 "Rocky Mountain Front Outstanding Natural Area Activity Plan/Environmental Assessment.

We are pleased that you have met the challenge to pursue much needed public access to SMK public lands in this important and sensitive area, much of which is now isolated from public use and enjoyment by a few affluent landowners who profit by locking out the public from SMK public lands.

Road access through the private property to the boundary of SMK public lands is essential to allow all of our people to use and enjoy SMK public lands for hunting, fishing, hiking, and other recreational activities consistent with sound resource management practices.

We will support you "all the way" in achieving this critical effort.

Let us know how we can help.

We appreciate the opportunity to comment on this document.

Sincerely yours,

Paul F. Berg

Paul F. Berg, Legislative Committees
Billings Rod & Gun Club, and Southeastern
Sportsmen Assoc.; Public Lands Committee,
Montana Wildlife Federation *
3708 Harry Cooper Place
Billings, MT 59106
Phone: (406) 656-2015

*Representing 10 clubs and 9,000 resident and nonresident sportsmen

PUBLIC PARTICIPATION-COORDINATION

About 110 Draft AP/EAs were distributed prior to August 4, 1988 to private citizens groups, and public agencies. A total of 16 comments were received from private citizens, groups, public agencies and private business. All letters of comment and the corresponding BLM responses are included in this EA.

The Blackfeet Tribal Council was sent a notice of the public scoping meeting dates and locations and a copy of the draft Outstanding Natural Area AP/EA. To date no response has been received from the council.

☆ U.S. GOVERNMENT PRINTING OFFICE: 1989-673-224/00000